



LEGISLATIVE BUDGET BOARD

Lockhart Independent School District

Management and Performance Review

PREPARED BY LEGISLATIVE BUDGET BOARD STAFF

DEBORAH OWENS CONSULTING
MOSS ADAMS, LLP
RESOURCES FOR LEARNING, LLC

LANGLINAIS FRAUD & AUDIT SERVICES, LLC
PALMER CONSULTING SERVICES, LLC

WWW.LBB.STATE.TX.US

SEPTEMBER 2018

Lockhart Independent School District

Management and Performance Review

PREPARED BY LEGISLATIVE BUDGET BOARD STAFF
DEBORAH OWENS CONSULTING LANGLINAIS FRAUD & AUDIT SERVICES, LLC
MOSS ADAMS, LLP PALMER CONSULTING SERVICES, LLC
RESOURCES FOR LEARNING, LLC

WWW.LBB.STATE.TX.US

SEPTEMBER 2018



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>

September 21, 2018

Mark Estrada
Superintendent
Lockhart Independent School District

Dear Superintendent Estrada:

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

The report's recommendations will help Lockhart ISD improve its overall performance as it provides services to students, staff, and community members. The report also highlights model practices and programs that Lockhart ISD is providing.

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

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ursula Parks".

Ursula Parks
Director
Legislative Budget Board

/rs

cc: Brenda Spillmann
Carl M. Cisneros
Tom Guyton
Rebecca Lockhart

Warren Burnett
Michael Wright
Steve Johnson

TABLE OF CONTENTS

Executive Summary	1
Chapter 1. District Organization and Community Involvement	9
Chapter 2. Educational Service Delivery	19
Chapter 3. Human Resources Management	31
Chapter 4. Business Services	37
Chapter 5. Transportation	45
Chapter 6. Facilities Management	57
Chapter 7. Safety and Security	69
Chapter 8. Food Services	79
Chapter 9. Technology Management	91

LOCKHART ISD EXECUTIVE SUMMARY

The Texas Legislature established the Texas School Performance Review in 1990 to “periodically review the effectiveness and efficiency of the budgets and operations of school districts” (the Texas Government Code, Section 322.016). The Legislative Budget Board’s (LBB) School Performance Review team conducts comprehensive and targeted reviews of school districts’ and charter schools’ educational, financial, and operational services and programs. The review team produces reports that identify accomplishments, findings, and recommendations based upon the analysis of data and onsite study of each district’s operations. A comprehensive review examines 12 functional areas and recommends ways to cut costs, increase revenues, reduce overhead, streamline operations, and improve the delivery of educational, financial, and operational services. School districts typically are selected for management and performance reviews based on a risk analysis of multiple educational and financial indicators.

To gain an understanding of the school district’s operations before conducting the onsite review, the LBB review team requests data from the district and from multiple state agencies, including the Texas Education Agency (TEA), the Texas Department of Agriculture, and the Texas School Safety Center. In addition, LBB staff may use other methods to obtain feedback on district operations, including surveys of parents, community members and district and campus staff. While onsite in the district, the review team gathers information through multiple interviews and focus groups with district and campus administrators, staff, and board members.

Lockhart Independent School District (ISD) is located in Lockhart. The district is served by Regional Education Service Center XIII (Region 13), located in Austin. The state legislators who represent the district are Senator Judith Zaffirini and Representative John Cyrier.

TEA has categorized Lockhart ISD as a fast-growth district. **Figure 1** shows the student enrollment growth from school years 2013–14 to 2017–18.

As **Figure 1** shows, Lockhart ISD’s student enrollment increased by 15.4 percent from school years 2013–14 to 2017–18. Rapid growth of the student population has affected the district’s provision of programs and services,

FIGURE 1
LOCKHART ISD TOTAL STUDENT ENROLLMENT
SCHOOL YEARS 2013–14 TO 2017–18

YEAR	STUDENTS	PERCENTAGE INCREASE FROM PRIOR YEAR	PERCENTAGE INCREASE FROM 2013–14 (1)
2013–14	5,113	3.1%	0.0%
2014–15	5,351	4.7%	4.7%
2015–16	5,377	0.5%	5.2%
2016–17	5,661	5.3%	10.7%
2017–18 (2)	5,901	4.2%	15.4%

NOTES:

- (1) The percentage increase for each year is based on the difference between enrollment for each year and enrollment for school year 2013–14.
- (2) Preliminary totals for school year 2017–18 as of October 2017.

SOURCES: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2016–17; Lockhart ISD, school year 2017–18.

particularly in the areas of educational service delivery, facilities, and transportation.

The district has 10 instructional campuses. The secondary campuses include Lockhart High School, Pride High School, Lockhart Junior High School, and Lockhart Discipline Management Center. The district’s elementary campuses include Alma Brewer Strawn Elementary School, Bluebonnet Elementary School, Carver Early Education Center, Clear Fork Elementary School, Navarro Elementary School, and Plum Creek Elementary School. For school year 2016–17, Lockhart ISD had 5,661 students enrolled in prekindergarten to grade 12. The student population was 73.7 percent Hispanic, 20.7 percent White, 3.4 percent African American, 0.5 percent Asian and Pacific Islander, and 0.3 percent American Indian. Approximately 68.2 percent of students were categorized as economically disadvantaged, greater than the state average of 59.0 percent. The district identified 19.9 percent of students as English Language Learners, which was greater than the state average of 18.9 percent. The district also identified approximately 60.7 percent of students as at risk of dropping out, which was greater than the state average of 50.3 percent.

EDUCATIONAL OVERVIEW

Lockhart ISD has a history of variable academic achievement. Within the state accountability system, the district was rated Met Standard for school years 2015–16 to 2016–17. For school year 2016-17, the most recent state accountability data available at the time of the review, Alma Brewer Strawn Elementary School and Bluebonnet Elementary School were rated Improvement Required, and all of the district’s other campuses were rated Met Standard. **Figure 2** shows state accountability ratings from school years 2013–14 to 2016–17 for the district and the individual campuses in accordance with the system that was implemented during school year 2012–13 (Met Standard, Improvement Required, or Not Rated).

Lockhart ISD’s academic performance is less than regional and state averages in some areas and greater than these averages in other areas. **Figure 3** shows various academic measures of Lockhart ISD compared to the average of other school districts in Region 13 and the state.

FINANCIAL OVERVIEW

For school year 2016–17, Lockhart ISD’s property wealth per student was \$148,527. This places the district at less than, and thus not subject to, the state’s primary equalized wealth level (EWL) of \$514,000. The state recaptures a portion of wealthy school districts’ local tax revenue at greater

than the EWL property wealth level to assist in financing public education in other districts. This primary EWL applies to a district’s tax rates up to \$1.00 per \$100 of valuation. The state’s school finance system has a secondary EWL that applies to certain enrichment tax effort greater than \$1.00.

For fiscal year 2017, Lockhart ISD’s total actual expenditures were approximately \$78,153,146. Lockhart ISD’s per-pupil actual operating expenditures for fiscal year 2017 were \$8,762, compared to the state average of \$9,503. For fiscal year 2017, Lockhart ISD spent approximately 57.0 percent of total actual operating expenditure on instruction, compared to the state average of approximately 56.2 percent. The instructional expenditures percentage was calculated using the district’s total actual operating expenditures that funded direct instructional activities, including budgetary Function 11 (Instruction), Function 12 (Instructional Resources and Media Sources), Function 13 (Curriculum Development and Instructional Staff Development), and Function 31 (Guidance, Counseling, and Evaluation Services).

ACCOMPLISHMENTS

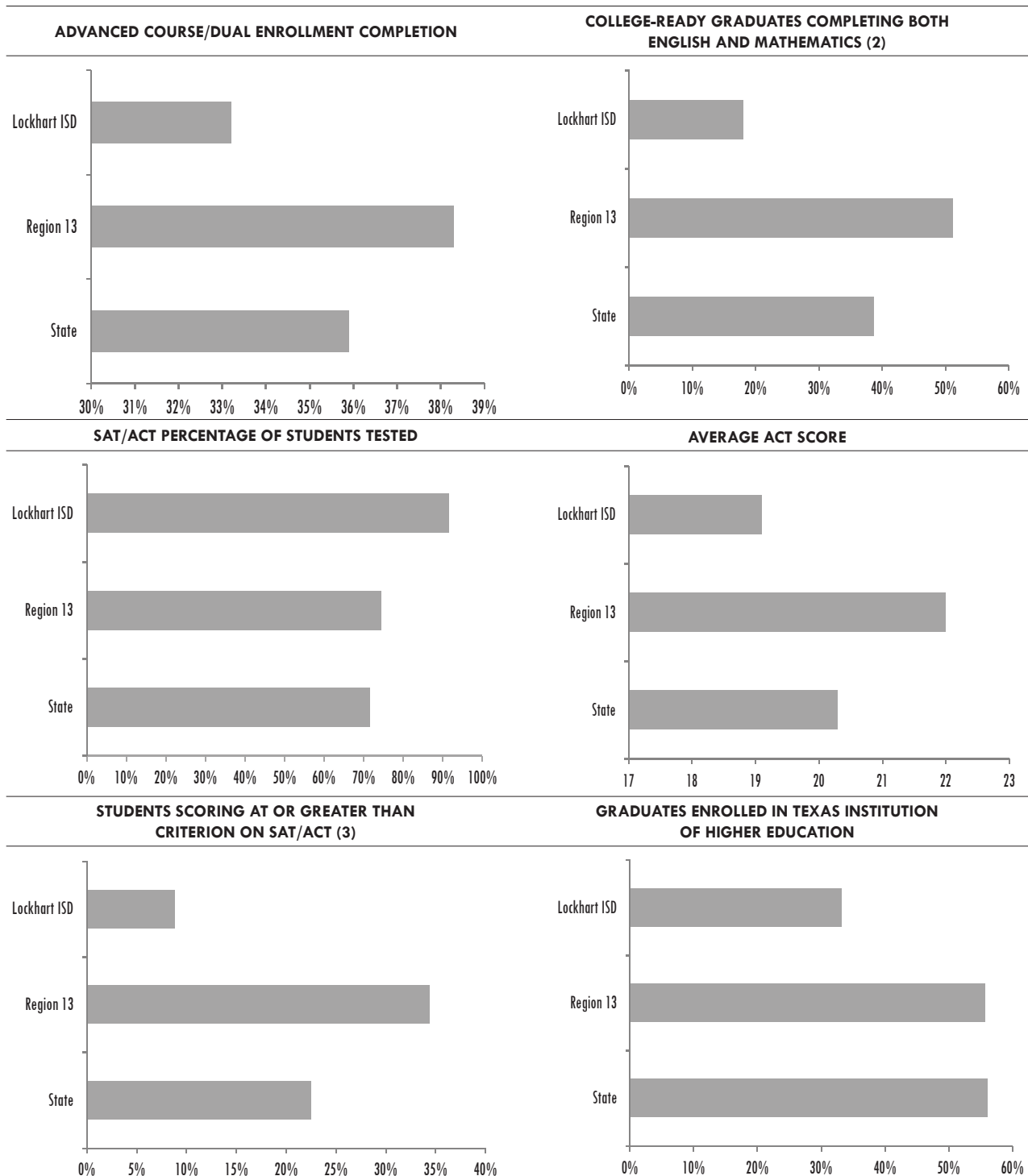
During the onsite review, the LBB’s School Performance Review Team identified noteworthy accomplishments in some of the district’s practices.

**FIGURE 2
LOCKHART ISD STATE ACCOUNTABILITY RATINGS
SCHOOL YEARS 2013–14 TO 2016–17**

CAMPUS	2013–14	2014–15	2015–16	2016–17
District	Met Standard	Met Standard	Met Standard	Met Standard
Lockhart High School	Met Standard	Met Standard	Improvement Required	Met Standard
Pride High School	Met Alternative Standard	Met Alternative Standard	Met Alternative Standard	Met Alternative Standard
Lockhart Junior High School	Met Standard	Met Standard	Met Standard	Met Standard
Alma Brewer Strawn Elementary School	N/A	N/A	N/A	Improvement Required
Bluebonnet Elementary School	Met Standard	Met Standard	Met Standard	Improvement Required
Carver Early Education Center	Met Standard	Met Standard	Met Standard	Met Standard
Clear Fork Elementary School	Met Standard	Met Standard	Met Standard	Met Standard
Navarro Elementary School	Met Standard	Met Standard	Met Standard	Met Standard
Plum Creek Elementary School	Improvement Required	Met Standard	Improvement Required	Met Standard

NOTE: Alma Brewer Strawn Elementary School opened in school year 2016–17.
SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2016–17.

**FIGURE 3
LOCKHART ISD STUDENT ACADEMIC MEASURES COMPARED TO REGION 13 (1) AND STATE AVERAGES
SCHOOL YEAR 2016–17**



NOTES:

- (1) Region 13=Regional Education Service Center XIII.
- (2) To be considered college-ready, a graduate must have met or exceeded the college-ready criteria on the State of Texas Assessments of Academic Readiness (STAAR) exit-level test, or the SAT or ACT standardized college admissions tests.
- (3) Criterion refers to the scores on the SAT and ACT college admissions tests. For these tests, the criterion scores are at least a composite 24 on the ACT and at least 1110 total on the SAT.

SOURCE: Texas Education Agency, Texas Academic Performance Report, 2016–17

SCHOOL RESOURCE OFFICERS

The district's school resource officer (SRO) program partners with the Lockhart Police Department to provide a more secure environment and foster a positive relationship between students and law enforcement.

The interlocal cooperation agreement between Lockhart ISD and the Lockhart Police Department defines the responsibilities of the city and the district, and includes detailed human resources procedures for scheduling vacation time, reporting absences, and accruing compensatory time. District staff have the authority to approve SRO staffing decisions and changes, including approval of officers assigned as substitutes.

The interlocal cooperation agreement includes a comprehensive cost summary used to calculate the financial responsibilities of the district and the city. The cost summary includes salary, benefits, vehicle and maintenance costs, and uniforms and equipment costs.

DATA-DRIVEN GOVERNANCE

During school year 2016–17, the superintendent and the board of trustees recognized a need for the board to enhance its role in improving student achievement. The board participated in a multisession governance workshop and developed a shared vision, established student outcome goals, applied student achievement data to governance decisions, and set up a goal monitoring system. As a result, the board developed data-driven district goals that are measurable and focused on student outcomes.

COMMUNITY SERVICES

Lockhart ISD fosters involvement with the community through community services and inclusion of the community in district initiatives. Lockhart ISD provides a range of services to support the needs of students, families, and residents in the community. The district's Community Education Department administers several affordable adult education classes, recreational sports, and child services that are fiscally self-sustaining and are often the only resources of their kind available in the Lockhart area.

Lockhart ISD also assembled a diverse bond task force to advise the district and promote community support for a bond election during school year 2013–14. The task force included participants that represented the district's diversity in terms of ethnicity, language, residential location, and campuses attended by students.

INFRASTRUCTURE

Lockhart ISD upgraded the district's technology infrastructure to provide a more robust and technology-rich environment for teachers, staff, and students. During school year 2014–15, the district began upgrading its facilities and equipment. During the next three school years, Lockhart ISD made extensive improvements to its technology infrastructure. These upgrades were funded through the district's general fund and the federal E-Rate Program. Staff indicated an increased satisfaction with the district's technology management.

FINDINGS AND RECOMMENDATIONS

The LBB's School Performance Review Team identified significant findings and recommendations based upon the analysis of data and onsite review of the district's operations. Some of the recommendations provided in the review are based on state or federal laws, rules, or regulations, and should be promptly addressed. Other recommendations are based on comparisons to state or industry standards or accepted best practices, and should be reviewed by the school district to determine the level of priority, appropriate timeline, and method of implementation.

SAFETY MANAGEMENT

Lockhart ISD lacks comprehensive documentation of safety and security procedures because many of the processes are informal. The district's Student Handbook, Student Code of Conduct, and Employee Handbook provide basic guidelines but lack detailed procedures to guide daily tasks. In addition, the district has no written procedures either for the safety and security committee or for soliciting stakeholder feedback regarding safety and security.

Lockhart ISD also lacks an adequate monitoring process to ensure that emergency plans are consistent, updated, and include required components for all campuses. The deputy superintendent provides emergency operations plan (EOP) templates and requires each campus administrator to develop a site EOP. However, district staff do not monitor the content of campus EOPs adequately to ensure consistent, updated plans that include all required components. In addition, campus plans do not ensure coordination effectively with the state and local health departments. Although most campus EOPs establish emergency drills, expectations for drills are inconsistent among campuses.

Lockhart ISD visitor management procedures are inconsistent across district campuses and facilities. During the onsite

review, the review team observed that the check-in process was consistent at nearly all facilities; however, the checkout process varied among school sites. In many instances, campuses required visitors to return their badges to the staff who provided the badges and authorized access to the site. However, it was the visitor's responsibility to check out at the security vestibule, and campuses had little to no way to enforce this process. Visitors at noninstructional facilities are required to sign in with either paper or computer-based systems, but they are not required to show identification or submit to background checks through the district's visitor management system. The administrative facilities also lack secure vestibules or electronic locking systems for external doors.

To improve safety management, the district should perform the following tasks:

- develop a procedural manual to guide the safety and security operations in the district and to document leadership directives;
- revise campus emergency operations plans and monitor plans to ensure consistency and compliance with statutory requirements; and
- strengthen controls of visitor management to ensure consistency and safety of students and staff districtwide.

PERFORMANCE MONITORING AND OVERSIGHT

Lockhart ISD does not have adequate performance monitoring and oversight in several areas. The district lacks internal controls of payments to contracted vendors. Although the district has a formalized process for procurement, it has not established procedures to ensure that payments for contracted services are accurate and authorized. Onsite interviews indicate internal confusion as to which district staff are responsible for validating that the vendor invoices are for actual services performed and that contract deliverables are completed. As a result, the district risks paying vendors for services that were not delivered or payments for unauthorized work.

Lockhart ISD lacks effective oversight of the operational performance of its transportation services. During the onsite review, the transportation management company appeared to be delivering efficient transportation services to the district. However, the district does not use performance objectives to measure against established targets and benchmarks, or key performance indicators to improve

operations. In addition to the absence of performance objectives, the transportation management company contract for all requirements lacks incentives for exceptional performance and consequences for failure to perform or failure to perform in a timely manner.

Lockhart ISD campuses use inconsistent and inaccurate methods to record the number of breakfasts served in the classroom and ensure accurate claims for reimbursement. Lockhart ISD implements Breakfast in the Classroom (BIC) at all elementary campuses and at the junior high school. BIC is an alternative meal-service model intended to improve access and participation in the federal School Breakfast Program by providing breakfast to students at the beginning of a morning class. Although the district's written procedures for BIC describe a process that complies with program requirements, some teachers do not follow the procedures consistently. Failure to ensure accurate claims for reimbursement could put the district's reimbursement funds at risk.

To improve performance monitoring and oversight, the district should perform the following tasks:

- develop and implement formal, districtwide procedures for the approval of contracted vendor invoices and communicate procedures to all district staff who manage contracts;
- amend the transportation management company contract and develop procedures to monitor the efficiency of transportation operations; and
- coordinate with the food service management company to ensure that teachers count and claim breakfasts for accurate reports of reimbursable meals in accordance with written procedures and federal regulations.

PLANNING AND PROCEDURES

Lockhart ISD has not developed long-term plans to prepare for future needs or sufficient procedures to guide staff in performing daily tasks. The district lacks a comprehensive, multiyear planning process that incorporates long-term needs, use of resources, and stakeholder goals. The planning document that most resembles a districtwide strategic plan is the district improvement plan (DIP). The DIP is a district-level, one-year plan intended to guide district and campus staff in the improvement of performance for all student groups to meet state student achievement standards. The DIP provides critical direction for Lockhart ISD; however,

the district annually develops a separate plan for each school year. Statute does not require the district to plan for the long term or to address systemic needs unrelated to student performance.

In addition to the absence of a multiyear strategic plan, Lockhart ISD also does not have adequate long-range planning in several operational areas, including facilities planning. The district's school year 2013–14 facilities master planning process was comprehensive, but the district has not updated it. Staff indicated that the master planning process is not formalized, and the status of long-term facilities planning in the district is inconsistent. Staff also indicated that the district has not developed a long-term deferred maintenance plan.

Similarly, Lockhart ISD lacks sufficient long-term planning for transportation needs related to projected enrollment growth. The district does not project the number of students that will require transportation, nor the number or capacity of buses needed to provide the anticipated increase in service. The district has not established fleet management policies, and fleet replacement procedures lack structure. The district typically plans funding for new buses annually rather than as part of a long-term replacement strategy.

Along with a lack of long-term planning, Lockhart ISD does not have written procedures to guide daily functions for several departments. For example, the district does not have written procedures for all human resources functions. The district also lacks procedures to guide an effective response to intervention program that supports struggling learners at all grade levels. Lockhart ISD does not have documented procedures to guide facilities-related functions, such as preventive maintenance and energy management.

To improve planning and procedures, the district should perform the following tasks:

- develop a three-year-to-five-year comprehensive strategic plan with measurable objectives to align all areas of district operations and serve as a framework for district decision making;
- establish district goals, expectations, and timelines for facilities planning;
- establish comprehensive planning procedures for replacing buses;
- develop and implement written procedures and regulations to guide human resources functions;

- establish a response to intervention process districtwide and regularly evaluate instructional programs used for student interventions for effectiveness; and
- develop a comprehensive procedures manual to address key responsibilities and functions related to facilities management, use, and maintenance.

STAFF MANAGEMENT

Lockhart ISD has several opportunities to enhance staff management. The district has not evaluated the equity and efficacy of custodial staffing and services. The district does not have staffing standards to determine the appropriate number of custodians at each facility and has not adopted cleanliness standards to set expectations and evaluate the effectiveness of custodial services. The review team observed inequities in staffing assignments, and custodians reported increased overtime due to the insufficient availability of substitutes.

Lockhart ISD's Technology Department lacks an organizational structure to provide the most efficient and effective technology support. The roles and responsibilities of the assistant superintendent of operations and technology and the technology coordinator are not defined clearly, which has led to some confusion among Technology Department staff. For example, department staff were unclear to whom they should report daily questions and concerns, or who would evaluate them officially at the end of the school year.

Lockhart ISD has not allocated the necessary resources to adequately support a rapidly growing English Language Learner (ELL) student population. The increase in the number of bilingual and English as a Second Language (ESL) students from school years 2012–13 to 2016–17 was 108.6 percent, and the increase in staff for the same period was 86.7 percent. A continued increase in the ESL program population without a commensurate increase in support could affect the quality of education provided to ELL students and the district's accountability ratings negatively.

To improve staff management, the district should perform the following tasks:

- adopt a comprehensive custodial staffing model, procedures, cleanliness standards, and a system for soliciting stakeholder feedback;
- revise the technology coordinator's job description to include director-level duties and ensure that all staff are aware of the Technology Department structure; and

- implement a process for continuous evaluation of the structure, staffing, instructional delivery, and resources of the district’s bilingual/ESL program to meet the needs of the English Language Learner student population.

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 from school years 2018–19 to 2022–23. **Figure 4** shows a summary of the fiscal impact of all 28 recommendations in the performance review.

**FIGURE 4
FISCAL IMPACT OF RECOMMENDATIONS BY SCHOOL YEAR**

IMPACT	2018–19	2019–20	2020–21	2021–22	2022–23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
Gross Savings	\$9,663	\$9,663	\$9,663	\$9,663	\$9,663	\$48,315	\$0
Gross Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total	\$9,663	\$9,663	\$9,663	\$9,663	\$9,663	\$48,315	\$0

CHAPTER 1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT

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

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

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

Lockhart Independent School District (ISD), established in 1901, is located in Lockhart, Texas, which has a total area of 15.6 square miles. Lockhart ISD is located in Caldwell County, which is approximately 30 miles south of Austin, Texas. According to the U.S. Census Bureau, the city of Lockhart had a population of 13,527 in 2016, an increase of 6.6 percent since the official 2010 census. In 2010, the percentage of persons younger than age 18 was 25.4 percent. Lockhart ISD is the largest employer in Lockhart. The district employed 610.2 staff in school year 2016–17. In 2016, the area's median household income was \$49,913.

According to the 2010 census, the population categorized themselves as 51.1 percent Hispanic or Latino, 38.4 percent White, 9.0 percent African American, 0.2 percent American Indian and Alaskan Native, and 0.4 percent Asian.

In school year 2016–17, Lockhart ISD had 5,661 students enrolled in pre-kindergarten through grade 12. The student population was 73.7 percent Hispanic, 20.7 percent White, 3.4 percent African American, 0.5 percent Asian and Pacific Islander, and 0.3 percent American Indian. There are 10 campuses in the district. The secondary campuses include Lockhart High School, Lockhart Junior High School, Pride High School, and Lockhart Discipline Management Center. The district's elementary campuses include Carver Early Education Center, Plum Creek Elementary School, Navarro Elementary School, Clear Fork Elementary School, Alma Brewer Strawn Elementary School, and Bluebonnet Elementary School.

The Lockhart ISD Board of Trustees (board) is the policy making body authorized by law to govern the district. The board has the following duties:

- adopting goals and objectives for the district;
- reviewing and acting on policies;
- adopting an annual budget and setting the tax rate; and
- approving school staff as recommended by the superintendent.

The seven-member board serves terms of four years. In 1991, Lockhart ISD settled a voting rights lawsuit by adopting four single-member districts and three at-large districts. Elections are held every two years. **Figure 1–1** shows Lockhart ISD's board members.

The board meets at 6:30 pm on the fourth Monday of each month in the Lockhart Junior High School Library. Board Policy BE (LOCAL) states that the board president can call special meetings at his or her discretion or upon request by two board members. From January 2017 to December 2017, the district held 15 special meetings.

The public may attend all regular meetings and may address the board on topics of interest. If the public wishes to participate, individuals must sign up with the presiding

**FIGURE 1–1
LOCKHART ISD BOARD OF TRUSTEES
SCHOOL YEAR 2017–18**

MEMBER	ROLE	FIRST ELECTED	EXPERIENCE (YEARS)
Brenda Spillmann	President	2008	9
Carl M. Cisneros	Vice President	2012	5
Tom Guyton	Secretary	2009	8
Rebecca Lockhart	Member	2016	1
Warren Burnett	Member	2016	1
Michael Wright	Member	2014	3
Steve Johnson	Member	2014	3

SOURCES: Lockhart ISD; Legislative Budget Board School Performance Review Team, September 2017.

officer or designee before the meeting begins and indicate the topic about which they wish to speak. Presentations are limited to five minutes.

Lockhart ISD live-streams board meetings on the district’s website and maintains an archive of previously recorded meetings that the public can view on-demand. The executive assistant to the superintendent typically takes the minutes of board meetings. The executive assistant to the superintendent compiles the minutes and distributes in an email to Lockhart ISD board members for approval at the next board meeting.

Ms. Susan Bohn was the Lockhart ISD superintendent from August 2016 through June 2018, including during the onsite fieldwork. In July 2018, the board appointed Mark Estrada as the superintendent. The superintendent reports directly to the board and eight staff report directly to the superintendent. The eight direct reports to the superintendent include:

- deputy superintendent;
- chief financial officer;
- assistant superintendent of operations and technology;
- assistant superintendent of curriculum and instruction;
- executive director of student programs;
- executive director of athletics and University Interscholastic League (UIL) activities ;
- public information officer; and
- executive assistant to the superintendent and the board.

Figure 1–2 shows Lockhart ISD’s organization at the time of the onsite review. During onsite interviews, the superintendent indicated that the district’s organization will be adjusted in school year 2017–18.

The superintendent and the director of community education manage community involvement activities and services at Lockhart ISD. Since the time of the onsite review, the district developed an executive director of communications and community services position that also has some community involvement responsibilities and oversight.

ACCOMPLISHMENTS

- ◆ Lockhart ISD’s Board of Trustees developed a data-driven governance framework to increase accountability and board effectiveness.
- ◆ Lockhart ISD provides a wide range of services to support the needs of students, families, and community members.

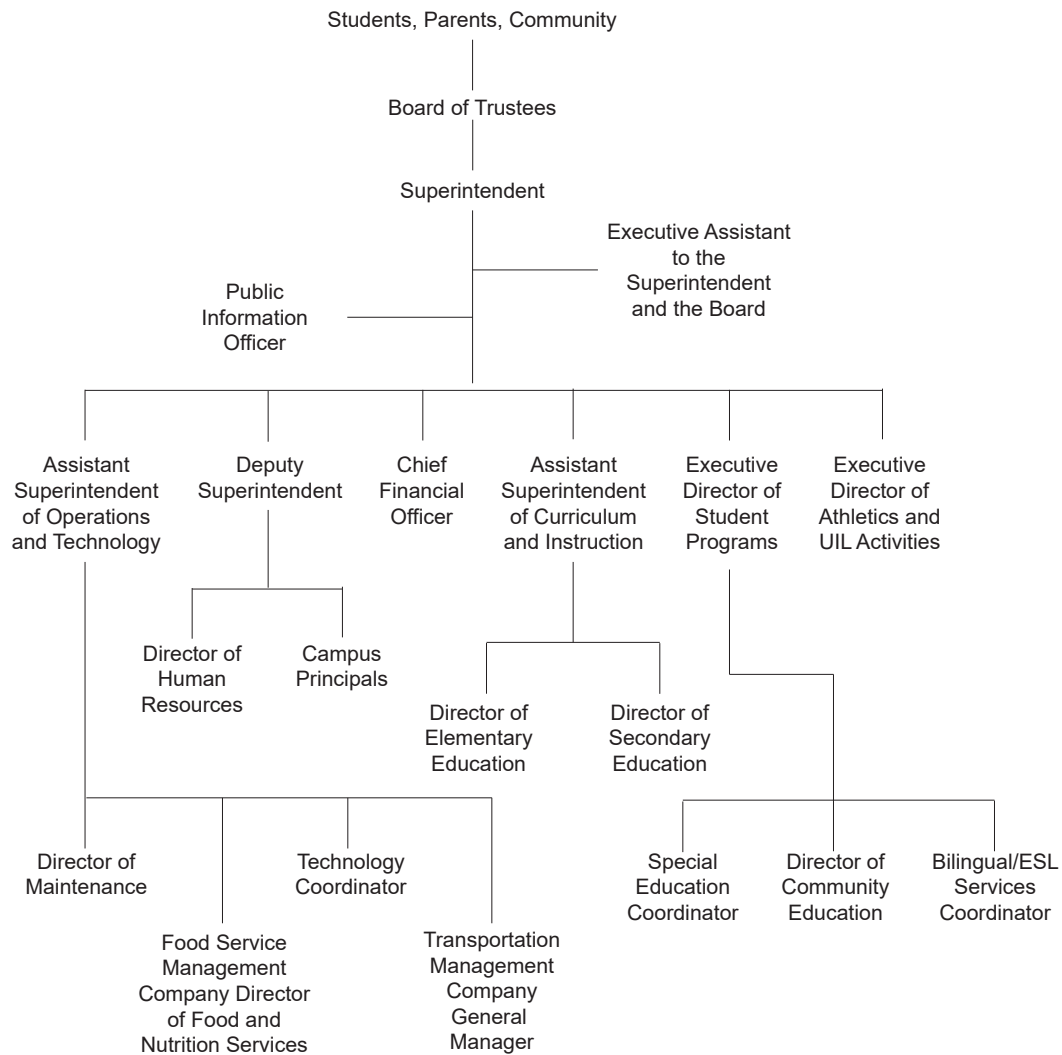
FINDINGS

- ◆ Lockhart ISD lacks a comprehensive, multi-year planning process that incorporates long-term needs, use of resources, and stakeholder goals.
- ◆ Lockhart ISD lacks a process to ensure clear communication flow between district leadership and campus staff.
- ◆ Lockhart ISD has low participation from parents and community members in district activities.

RECOMMENDATIONS

- ◆ **Recommendation 1: Develop a three-to five-year comprehensive strategic plan with measurable objectives to align all areas of district operations and serve as a framework for district decision making.**
- ◆ **Recommendation 2: Develop a formal internal communications protocol that defines expectations for communicating key messages, initiatives, and directives from leadership team meetings to other district staff.**
- ◆ **Recommendation 3: Develop and implement a centralized parental and community volunteer program that includes written guidelines for campuses and volunteers and volunteer recruitment strategies.**

**FIGURE 1–2
LOCKHART ISD ORGANIZATION
SCHOOL YEAR 2017–18**



NOTE: This figure shows Lockhart ISD organization at the time of the onsite review. Since the time of the review, the district moved the special education coordinator position and the bilingual/English as a Second Language (ESL) services coordinator position to report to the assistant superintendent of curriculum and instruction. The district also moved the director of community education position to report to a new executive director of communications and community services position.

SOURCES: Legislative Budget Board School Review Team; Lockhart ISD, November 2017.

DETAILED ACCOMPLISHMENTS

DATA-DRIVEN GOVERNANCE

Lockhart ISD’s Board of Trustees developed a data-driven governance framework to increase accountability and board effectiveness.

In school year 2016–17, the superintendent and the board recognized a need for the board to enhance its role in

improved student achievement. The board participated in a multi-session governance workshop developed by the Texas Association of School Boards (TASB). Lockhart ISD was the first district in Texas to participate in the TASB governance workshop.

During the training, board members developed a shared vision, established student outcome goals, learned how to apply student achievement data to governance decisions, and

set up a goal monitoring system. Board members also completed a self-assessment instrument to evaluate the board's work in several standards of board practice that research shows support student achievement. These standards included governance and roles, vision, structure, accountability, and advocacy.

As a result of participating in governance training, the board developed data-driven district goals that are measurable and focused on student outcomes. According to interviews with district staff and board members, the board did not regularly review student data at board meetings prior to participating in the governance workshop; board members stated that board meetings primarily focused on the budget. However, beginning in school year 2017–18, the board reviews student assessment data at every regular board meeting to monitor progress towards the district's achievement targets. Board members stated that participating in the training improved the board's ability to understand how to direct resources to support the district's academic goals, and that for the first time, the board has foundational data to measure its effectiveness.

COMMUNITY SERVICES

Lockhart ISD provides a wide range of services to support the needs of students, families, and community members. The district's Community Education Department administers several affordable adult education classes, recreational sports, and child services that are available to the public. Most of the programs are fiscally self-sustaining and are often the only resource of their kind available in the City of Lockhart and surrounding areas.

Athletic programs include a youth basketball program, American Red Cross swim lessons, karate lessons, men's basketball and women's exercise programs. These programs provide a valuable resource to the community, as the city of Lockhart does not have any city recreational sports leagues or a YMCA.

Lockhart ISD provides summer enrichment camps designed and managed by certified teachers; after school programs at all elementary campuses; adult General Equivalency Diploma and High School Equivalency exam prep and testing; and ESL classes for adults. The district also has a day care program available to district staff and student parents. The day care is the only four-star rated child care facility in Caldwell County.

DETAILED FINDINGS

STRATEGIC PLANNING (REC. 1)

Lockhart ISD lacks a comprehensive, multi-year planning process that incorporates long-term needs, use of resources, and stakeholder goals.

Lockhart ISD develops several plans each year. These include:

- district improvement plan (DIP);
- campus improvement plans (CIPs);
- campus targeted improvement plans (TIPs); and
- campus emergency operations plans (EOPs).

While the district has policies for developing required district and campus plans, there is no process for developing a long-range strategic plan from which required annual district and campus plans evolve.

The Texas Education Code (TEC) Section 11.252 requires school districts to develop a DIP. The DIP is a district-level, one-year plan and its purpose is to guide district and campus staff in the improvement of student performance for all student groups to meet the state student achievement standards. The superintendent with the assistance of the district-level planning and site based decision-making committee develops the DIP. In addition to the DIP, TEC Section 11.253 requires all campuses develop a CIP. The CIP is a campus-level one-year plan that sets the campus educational objectives and notes how the campus will allocate resources and time to meet the determined objectives. For school year 2016–17, two Lockhart ISD campuses also developed a campus-level TIP because the Texas Education Agency (TEA) designated the campuses as improvement required under the state accountability system. The campus TIP addresses all areas of insufficient performance for those campuses TEA designated as improvement required.

The district has also developed plans in response to district initiatives. These plans include a facilities master plan in school year 2012–13 in preparation for a facilities bond, and a curriculum management plan in school year 2016–17 in response to recommendations from a curriculum audit in school year 2015–16.

Lockhart ISD's planning document that most resembles a districtwide strategic plan is the DIP. According to onsite interviews, district administration improved the planning process for developing the DIP for school year 2017–18. In previous years, the process for developing the DIP was disjointed with various goals that were not measurable and not tied to campus-level planning documents. For school year 2017–18, the board of trustees developed a mission and vision statement. In the summer of 2017, Lockhart ISD's leadership team developed performance goals and targets for school year 2017–18 that are data-informed, specific, and measurable to advance student achievement. The district also identified resources and strategies for achieving these goals, and the goals

and targets are reflected in the CIPs. Campus staff reported that improving the DIP and CIP process allows for better comparison between campuses.

According to board members and district staff, the district does not have a comprehensive strategic plan and neither the board nor superintendent has initiated a process to develop one. While the district’s DIP provides critical direction for the district, the district develops the plan on an annual basis. Statute does not require the DIP to provide long-range planning, or to address systemic needs unrelated to student performance, such as facility needs. In keeping with the TEC, Lockhart ISD’s DIP focuses on instruction and includes goals and objectives for student academic achievement; the DIP does not address transportation, food service, asset and risk management, and other areas of district operations. In the absence of a long-range planning process, the district addresses items such as facilities and risk management in ancillary documents that are not integrated into a comprehensive strategic plan.

Without a comprehensive strategic plan of three to five years, the district may react to administrative, operational, and academic challenges annually rather than plan systematically through a well-defined process. In addition, without an established and comprehensive strategic planning process, a district cannot articulate its future direction based on

consensus of long-term needs, use of resources, or stakeholder goals. Stakeholder involvement is essential to developing a long term strategic plan that meets the educational needs of the community the school district serves. Without involvement from internal and external stakeholders in the strategic planning process, the district cannot develop a shared vision for the future and structure its instructional programs, operations, technology, safety and security, and facility programming to meet the needs of its students and community.

Strategic plans allow school districts to overcome unforeseen events more quickly, allocate budget and human resources to achieve goals more efficiently, and establish accountability standards more effectively. For example, a drop in tax base due to the economic decline could affect the district’s budget without proper planning. Sound strategic plans encompass all aspects of district operations including academic, operational, and financial goals. Each goal is tied to resource requirements, student achievement, implementation steps, timelines, action items, performance measures, and fund requirements. A strategic planning process can also be a means for obtaining stakeholder “buy-in” by bringing staff, parents, and community members into the planning process.

Figure 1–3 shows a best practice model of a strategic planning process.

**FIGURE 1–3
STRATEGIC PLANNING BEST PRACTICE MODEL**

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

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

Districts use different strategies to establish a comprehensive strategic planning process. For example, Tatum ISD uses a strategic planning and monitoring process called a Continuous Improvement Cycle that involves iterative and ongoing review and alignment of the district's strategic plan, program plans, and CIPs. All of these plans are developed and reviewed with significant input from all stakeholders including staff, teachers, parents, and community members. Each January, the superintendent presents a monitoring report to the board showing highlights, issues, and plans for each objective of the strategic plan that the district has adopted as the official DIP for that year.

Nacogdoches ISD also implemented a long-term strategic plan that includes a process to ensure the district links expenditures of federal and local funds to strategies outlined in its planning documents. District staff requesting expenditure of funds are required to write the goal, performance objective, and strategy from the respective plans on the purchase requisition. This process intentionally links the planning with the expenditure of funds and reduces the risk of the district spending funds for unnecessary items that do not move the planning objectives forward.

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

The superintendent and the board should ensure the strategic planning process addresses functional areas that are not included in the DIP, such as facilities, technology, risk management, and safety and security. Any strategic planning efforts by the district should include input from staff as well as community members and other stakeholders.

To implement this recommendation, Lockhart ISD should do the following:

- form a district team (superintendent, leadership staff, board representative, and cabinet staff) to develop a timeline for the strategic planning process, identify participants, and facilitate the logistics of the process;
- form a district steering committee (district administration, teachers, principals, board, business community, parents, and students) representing all stakeholder groups to identify the overall direction, values, mission, vision, purpose, and goals for the plan;

- establish an action planning committee (one representative from each stakeholder group: superintendent, senior staff, teachers, principals, board, business community, parents, and students) to write objectives, create strategies, identify resources, and design metrics to measure the outcomes;
- ensure that the plan is written, shared with the public, and posted on the district website for public comment;
- incorporate components of the plan in the annual district and campus improvement plans; and
- develop key highlights of the strategic plan to share with the business community and other organizations.

In developing this plan, the district team should supplement the goals with specific measurable long-term objectives for both instructional and non-instructional areas. In addition, the action plan should identify the resources required to accomplish the goals including funding sources. The district should also identify staff assigned to achieve the goals within an established timeline. The typical period for achieving goals established in a long-term strategic plan is three to five years. The assigned staff should periodically report to the board on the progress of accomplishing each action plan.

Lockhart ISD should also consider holding an annual strategic planning retreat with board members, the superintendent, and any identified key stakeholders to discuss the progress of the strategic plan.

The district could implement this recommendation with existing resources.

STAFF COMMUNICATION (REC. 2)

Lockhart ISD lacks a process to ensure clear communication between district leadership and campus staff.

The district holds cabinet meetings every week. Attendees at the cabinet meetings include the superintendent; the deputy superintendent; the assistant superintendent of curriculum and instruction; the assistant superintendent of operations and technology; the executive director of student programs; the chief financial officer; and the public information officer. During these meetings, attendees discuss district initiatives, student data and progress towards the district's goals, and how to target the district's spending to support the achievement of the district's targets.

Each month after regular board meetings, the superintendent holds district leadership team meetings. Attendees include cabinet staff as well as all the campus principals, the director of human resources, the director of elementary education, the director of secondary education, the executive director of athletics and UIL activities, the special education coordinator, the director of community education, the Public Education Information Management System (PEIMS) coordinator, the bilingual/ESL services coordinator, the director of maintenance, the director of food and nutrition services, and the technology coordinator. During the meetings, the superintendent and the deputy superintendent discuss the highlights of the previous board meeting, decisions made during cabinet meetings, and news and upcoming events in the district. Leadership team staff reported that that meetings always have an agenda, and any leadership staff can add items to the agenda. Most leadership staff reported during interviews they receive clear communication and strong support from the superintendent and the cabinet.

Although communication among district leadership is strong, the review team observed there is an opportunity to improve the flow of information between leadership staff and campus staff. The superintendent relies on individual members of the leadership team to communicate information discussed in leadership team meetings with their respective departments. Some members of the leadership team indicated they routinely conduct meetings within their departments within a few days of the leadership team meetings to ensure decisions, directives, and key messages reach staff. However, these team and department meetings are not required of leadership team members, and campus staff reported that districtwide decisions, procedures and requirements are often unclear or inconsistently relayed from the leadership team.

For example, campus staff reported confusion among administrators and teachers on the number of walkthroughs per week the district requires as part of the new district goals established for school year 2017–18. In addition, onsite interviews indicate that some teachers have a negative perception of the walkthroughs because information communicated by principals may not accurately reflect district staff intentions. Campus staff also reported a lack of communication about changes to the district's organizational structure. The district established several new positions during the summer before school year 2017–18, including the director of human resources position, the public information officer position, and the assistant superintendent of operations and technology position. Campus staff stated

that they received a copy of the press release announcing the new district staff, but did not receive information about the roles and responsibilities of these positions and how they applied to the campuses. Campus staff indicated that they often learn district-level information, such as available training opportunities by contacting staff at other campuses. Lockhart ISD does not have a formal internal communications plan that identifies expectations for communicating key messages regarding decisions, directives and initiatives originating from district leadership.

When internal communication between management and staff in an organization is ineffective, informal networks, rumors, and uncoordinated messages may circulate in the absence of formal information. The district risks organizational initiatives not being maximized because key information about the leadership's intentions and goals may not reach all levels of affected staff. According to the Council of the Great City Schools, in its 2009 publication *Building Public Confidence in Urban Schools: It Begins Inside the District, A Guide for Administrators and Board Members*, school district staff are the front-line individuals in the community in word-of-mouth communication, and should be informed, influenced and motivated through an ongoing internal communications operation. The publication states that all school district leaders are responsible for communicating with staff, and important elements of internal communication include:

- understanding by top management and the school board of the critical role internal communications plays in building support for public education and reform initiatives;
- conducting scheduled meetings with staff by the superintendent, senior, and middle management; and
- establishing and encouraging two-way communications by obtaining constructive feedback from staff and school communities.

The publication also suggests developing strategies and tactics to “build bridges” (i.e., communicate initiatives, decisions, etc.) to all segments of an organization. Examples of strategies and tactics to build bridges of communication included in the Council of the Great City School's publication include:

- developing staff opinion surveys to gauge what communication tools they desire to be informed and buy into the system;

- refining and improving communication vehicles used to disseminate information to staff;
- creating a “communications toolkit” for principals and managers that includes key messages to be shared when describing a major initiative, memo templates for use in communicating with staff, and talking points for staff meetings;
- working with principals to ensure all written materials can be easily understood, making sure communication is jargon-free; and
- convening a standing internal communications advisory group.

Lockhart ISD should develop a formal internal communications protocol that defines expectations for communicating key messages, initiatives, and directives from leadership team meetings to other district staff. The district should include strategies and tactics recommended by the Council of the Great City Schools as part of the internal communications protocol. These strategies and tactics should include:

- developing a consistent electronic communications vehicle to keep managers, supervisors, and other staff informed, such as a monthly fact sheet detailing initiatives and directives from leadership team meetings;
- conducting periodic, scheduled meetings between campus staff and the superintendent and members of the leadership team;
- developing an opinion survey to determine which communication tools staff desire or prefer to be informed about issues from the management to enable them to buy into the system;
- refining and improving existing communication vehicles used to disseminate information to staff, including newsletters, e-mails and intranet postings; and

- creating a “communications toolkit” for principals, directors and supervisors that include key messages to be shared when describing a major initiative from the leadership team, memo templates for use in communicating with teachers and staff, and talking points for staff meetings.

The district could implement this recommendation with existing resources.

DISTRICT VOLUNTEERS (REC. 3)

Lockhart ISD has low participation from parents and community members in district activities.

Figure 1–4 shows the results of a question from surveys the Legislative Budget Board School Performance review team conducted of Lockhart ISD parents and campus staff regarding parental and community volunteers.

As shown in Figure 1–4, more than 65.0 percent of campus staff disagreed or strongly disagreed that schools have enough volunteers to help with student and school programs. Approximately 45.0 percent of parents offered the same opinion.

Lockhart ISD does not have a centralized district-coordinated volunteer program. Each campus manages its own volunteer program and without any guidance at the district level. For example, Plum Creek Elementary School has a program that allows parents to volunteer to be reading tutors for students. However, no other such program exists in any of the other elementary schools. Lockhart ISD also has no clear district procedures to instruct parents on how to become a volunteer. The district does require background checks for volunteers, but during onsite interviews, parents indicated that the background process often hinders volunteerism. Parents stated that the approval process to become a volunteer can take up to six weeks at some campuses.

Lockhart ISD also lacks a mechanism to advertise volunteer opportunities to parents or community members. There is no official list of volunteer opportunities available for

**FIGURE 1–4
RESULTS FROM SURVEYS OF PARENTS AND CAMPUS STAFF REGARDING VOLUNTEERISM AT LOCKHART ISD
OCTOBER 2017**

Question 8. Schools have a sufficient number of volunteers to help with student and school programs.

SURVEY RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
Parents	4.9%	22.3%	28.0%	33.4%	11.4%
Campus Staff	2.9%	18.5%	13.5%	47.9%	17.2%

SOURCE: Legislative Budget Board, School Performance Review Team Survey, October 2017.

individuals who may be interested. Additionally, the district and campus websites do not have any information on volunteering or volunteer opportunities.

For existing campus volunteers, no standard system tracks the volunteer information, such as names, home and email addresses, areas of interest, or the number of volunteer hours accrued per volunteer and campus. Without such information, campuses cannot easily establish a volunteer contact list for events and fundraisers. In addition, the district lacks historical information regarding volunteer interest and participation that could assist in the organization of events that are repeated in subsequent years.

With the absence of a comprehensive volunteer program, the district and campuses miss opportunities to build reciprocal, trusting relationships among parents, school staff, and the community. Volunteers can have a tremendous effect on the success of the educational system. They can provide additional classroom support to enable teachers and staff to use more of their time for instruction. They can provide more opportunity for students to engage in one-on-one learning. Volunteers are essential to enhancing the quality of student instruction and school experiences.

TEA emphasizes the importance of parent and family involvement in public education. The agency developed a Parent Involvement Manual to enable school districts and community volunteers to consider new ways to involve parents and families in the education of their children. The manual includes surveys, handouts, activities for meetings, and research on parental involvement.

The National Parent Teachers Association's Seven Steps to a Successful Volunteer Program provides useful information for developing and maintaining an active school volunteer program. The steps include:

- assessing volunteer needs at campuses;
- working with and training principals, teachers, and school staff on effectively using and supervising volunteers;
- setting goals and objectives for volunteer assignments;
- recruiting volunteers;
- training and orienting volunteers;
- retaining and recognizing volunteers; and
- evaluating volunteer performance and program success.

Lockhart ISD should develop and implement a centralized parental and community volunteer program that includes written guidelines for campuses and volunteers and volunteer recruitment strategies.

The public information officer should coordinate with campus administrators, parents, and teachers to develop a districtwide volunteer program that encourages parents and community members to become active participants in the district's educational processes. The public information officer should begin by developing written procedures that guide parents, community members, and campus staff through the volunteer process.

The public information officer should use TEA's Parent Involvement Manual as a guideline to develop the volunteer program. The program should include processes for:

- recruiting volunteers;
- matching volunteers to need;
- tracking volunteer hours and other types of contributions;
- acknowledging volunteers;
- developing a list of volunteer opportunities at each campus; and
- improving the efficiency of the background check process for volunteering.

The public information officer should post information about volunteer opportunities on the district's social media pages as well as the district and campus websites.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

- Lockhart ISD is a fast growth district, and district administration and the board continuously monitor enrollment growth through professional demographic studies. The district uses the data for planning and budgeting, and communicates the studies to the public on the district's website.

- Lockhart ISD established and filled a public information officer position that coordinates the district’s communications to the public and the media. However, the district’s purchasing manager manages responses to open records requests. This assignment was added to the purchasing manager’s job duties prior to the establishment of the public information officer position. Shifting the open records request responsibilities to the public information officer would improve the effectiveness and efficiency of job assignments.

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	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 1. DISTRICT ORGANIZATION AND COMMUNITY INVOLVEMENT							
1. Develop a three-to five-year comprehensive strategic plan with measurable objectives to align all areas of district operations and serve as a framework for district decision making.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2. Develop a formal internal communications protocol that defines expectations for communicating key messages, initiatives, and directives from leadership team meetings to other district staff.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3. Develop and implement a centralized parental and community volunteer program that includes written guidelines for campuses and volunteers and volunteer recruitment strategies.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 2. EDUCATIONAL SERVICE DELIVERY

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

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

Lockhart Independent School District (ISD) has 10 campuses that include an early education prekindergarten, five elementary schools, one junior high school, one self-paced high school, a disciplinary alternative education program, and a traditional high school. The district enrollment for school year 2016–17 was 5,661 students.

Figure 2–1 shows the demographics of Lockhart ISD compared to state averages. For school year 2016–17, the student population was 73.7 percent Hispanic, 20.7 percent White, 3.4 percent African American, 1.4 percent two or more races, 0.4 percent Asian, 0.3 percent American Indian, and 0.1 percent Pacific Islander. Approximately 68.2 percent of students were categorized as economically disadvantaged, greater than the state average of 59.0 percent. The district identified 19.9 percent of students as English Language Learner students (ELL), which is greater than the state average of 18.9 percent. Approximately 60.7 percent of students are designated as at risk, which is also greater than the state average of 50.3 percent.

Figure 2–2 shows the state accountability ratings for Lockhart ISD and its campuses for school years 2014–15 to 2016–17. During this period, Lockhart ISD met state standards at the

FIGURE 2–1
LOCKHART ISD STUDENT DEMOGRAPHICS
SCHOOL YEAR 2016–17

STUDENTS	DISTRICT	STATE
Hispanic	73.7%	52.4%
Asian	0.4%	4.2%
White	20.7%	28.1%
Two or More Races	1.4%	2.2%
African American	3.4%	12.6%
American Indian	0.3%	0.4%
Pacific Islander	0.1%	0.1%
Economically Disadvantaged	68.2%	59.0%
English Language Learner Students	19.9%	18.9%
At Risk	60.7%	50.3%

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2016–17.

district level, but it had inconsistent results at the campus level. Lockhart High School and three elementary schools were rated Improvement Required by the Texas Education Agency (TEA).

The Legislative Budget Board's School Performance Review Team visited the district in November 2017. **Figure 2–3** shows the Lockhart ISD educational service delivery organization at the time of the team's onsite review. The deputy superintendent, executive director of student programs, and assistant superintendent of curriculum and instruction are responsible for the educational delivery systems of the district. The deputy superintendent reports to the superintendent and oversees principals on the 10 campuses.

Since the time of the onsite review, Lockhart ISD moved the bilingual/English as a Second Language coordinator position to report to the assistant superintendent of curriculum and instruction. The district added the position of director of special services to oversee the special education coordinator, and also moved these positions to report to the assistant superintendent of curriculum and instruction. The district moved the Public Education Information Management System (PEIMS) coordinator to report to the deputy superintendent.

**FIGURE 2-2
LOCKHART ISD DISTRICT AND CAMPUS ACCOUNTABILITY RATINGS
SCHOOL YEARS 2014-15 TO 2016-17**

CAMPUS (1)	2014-15	2015-16	2016-17
District	Met Standard	Met Standard	Met Standard
Lockhart High School	Met Standard	Improvement Required	Met Standard
Pride High School	Met Alternate Standard	Met Alternate Standard	Met Alternate Standard
Lockhart Junior High School	Met Standard	Met Standard	Met Standard
Alma Brewer Strawn Elementary School	(2)	(2)	Improvement Required
Bluebonnet Elementary School	Met Standard	Met Standard	Improvement Required
Clear Fork Elementary School	Met Standard	Met Standard	Met Standard
Navarro Elementary School	Met Standard	Improvement Required	Met Standard
Plum Creek Elementary School	Met Standard	Met Standard	Met Standard
Carver Early Education Center	Met Standard	Met Standard	Met Standard

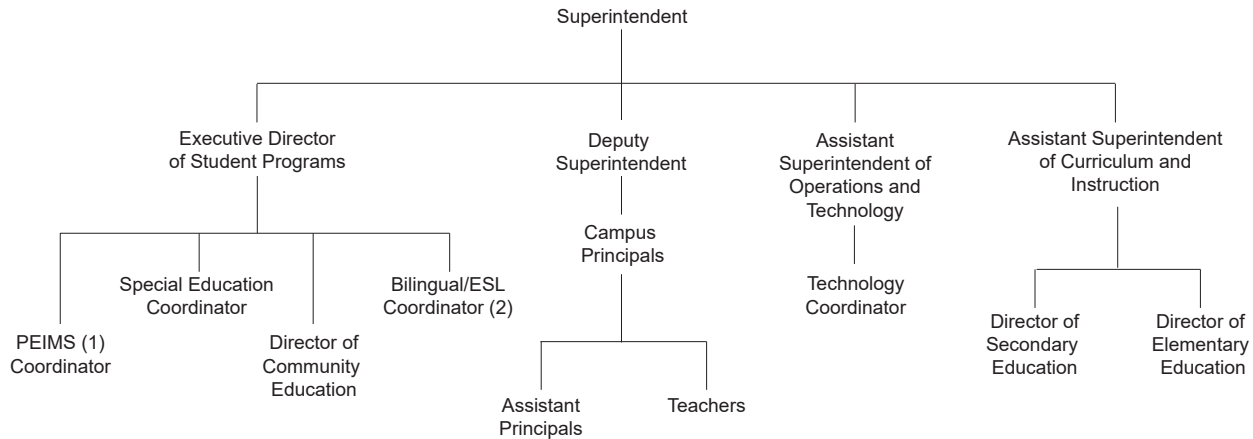
NOTES:

(1) Data excludes the Lockhart Discipline Management Center; this campus does not receive accountability ratings.

(2) Alma Brewer Strawn Elementary School opened during school year 2016-17.

SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2014-15 to 2016-17.

**FIGURE 2-3
LOCKHART ISD EDUCATIONAL SERVICE DELIVERY ORGANIZATION
SCHOOL YEAR 2016-17**



NOTES:

(1) PEIMS = Public Education Information Management System.

(2) ESL = English as a Second Language.

SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

FINDINGS

- ◆ Lockhart ISD has not allocated the necessary resources to adequately support a rapidly growing English Language Learner student population.

- ◆ Lockhart ISD lacks procedures to guide an effective response to intervention program that supports struggling learners at all grade levels.

- ◆ Lockhart ISD lacks adequate hardware and technology training to fully support progress toward the district’s student achievement goals.

RECOMMENDATIONS

- ◆ **Recommendation 4: Implement a process for continuous evaluation of the structure, staffing, instructional delivery, and resources of the district's bilingual/ESL program to meet the needs of the English Language Learner student population.**
- ◆ **Recommendation 5: Establish a response to intervention process districtwide and regularly evaluate instructional programs used for student interventions for effectiveness.**
- ◆ **Recommendation 6: Evaluate the district's existing technology resources to meet the needs of students and teachers and support the achievement of district goals.**

DETAILED FINDINGS

ENGLISH LANGUAGE LEARNER STUDENTS (REC. 4)

Lockhart ISD has not allocated the necessary resources to adequately support a rapidly growing English Language Learner student population.

The Texas Education Code, Section 89.1203, defines an English Language Learner (ELL) as “a person who is in the process of acquiring English and has another language as the first native language.” The goal of a bilingual/ESL program is to provide ELLs with instructional support that will enable them to participate fully in their educational experience in schools and in their communities.

Lockhart ISD's bilingual/ESL coordinator is responsible for overseeing the district's bilingual/ESL services and the Language Proficiency Assessment Committee (LPAC) process. Upon enrollment, the district administers the home language survey to new students. If the student predominantly speaks a language other than English, the district administers English proficiency exams to determine placement in the bilingual/ESL program. The LPAC reviews all pertinent information on each ELL student at the time of initial enrollment, throughout the school year, and at the end of the school year. The LPAC places students in the appropriate program, monitors the progress of ELL students, and recommends their exit from ESL programs when appropriate. Students identified as ELLs in prekindergarten to grade five are served in a transitional bilingual/late-exit program model. Students receive instruction in English and Spanish and eventually are transferred to English-only instruction. The student is eligible to exit the program no earlier than six years

or later than seven years after the student enrolls in school. For grades six to 12, students identified as ELLs are served in an ESL program. The ESL program includes instruction structured to develop proficiency in listening, speaking, reading, and writing in English.

Lockhart ISD has experienced rapid and significant growth in its ELL population. **Figure 2–4** shows the population of Lockhart ISD's ELL students from school years 2013–14 to 2017–18.

TEA has categorized Lockhart ISD as a fast-growth district because its total student population has grown from 5,113 for school year 2013–14 to 5,661 for school year 2016–17, or 10.7 percent. During the same period, the ELL student population grew from 591 for school year 2013–14 to 991 for school year 2016–17, an increase of 67.7 percent. Preliminary data for school year 2017–18 show the number of ELL students to be 1,230.

Although the growth of the ELL population significantly outpaces the growth of the total student population, Lockhart ISD has not allocated sufficient resources to adequately support the needs of these students.

In June 2016, the superintendent developed a new bilingual/ESL coordinator position. Before the development of this new position, the district had no districtwide bilingual/ESL curriculum, and every campus had its own bilingual/ESL program. The district had no districtwide tracking of bilingual/ESL students' progress. According to onsite interviews, several teachers in the district teaching bilingual/ESL students did not have a bilingual/ESL certification. The district had not requested emergency waivers to remain compliant with certification requirements. Furthermore, training in bilingual/ESL instructional methods was not consistent. Since filling the position, the bilingual/ESL coordinator has made several corrections and improvements. These changes include establishing a districtwide bilingual curriculum, providing training in bilingual/ESL instruction, establishing an LPAC system, and ensuring compliance by requesting waivers from TEA for bilingual/ESL teachers who were not certified for ELL populations. According to onsite interviews, for school year 2016–17, the district requested and TEA approved 15 waivers. At the time of the interviews, for school year 2017–18, the district had requested and TEA had approved 12 waivers.

Although the bilingual/ESL coordinator has made these improvements, opportunities exist for Lockhart ISD to provide more support for this program. **Figure 2–5** shows

**FIGURE 2–4
LOCKHART ISD TOTAL STUDENT ENROLLMENT AND BILINGUAL/ENGLISH AS A SECOND LANGUAGE (ESL) ENROLLMENT
SCHOOL YEARS 2013–14 TO 2017–18**

YEAR	STUDENTS	BILINGUAL/ESL STUDENTS	PERCENTAGE BILINGUAL/ESL STUDENTS	PERCENTAGE INCREASE TOTAL ENROLLMENT	PERCENTAGE INCREASE BILINGUAL/ESL ENROLLMENT
2013–14	5,113	591	11.6%	3.1%	24.4%
2014–15	5,351	711	13.3%	4.7%	20.3%
2015–16	5,377	749	13.9%	0.5%	5.3%
2016–17	5,661	991	17.5%	5.3%	32.3%
2017–18 (1)	5,901	1,230	20.8%	4.2%	24.1%

NOTE: Preliminary figures for school year 2017–18 as of October 2017.
 SOURCES: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2016–17; Lockhart ISD, school year 2017–18.

**FIGURE 2–5
LOCKHART ISD AND STATE BILINGUAL/ENGLISH AS A SECOND LANGUAGE (ESL) EXPENDITURES
SCHOOL YEARS 2013–14 TO 2016–17**

EXPENDITURES	2013–14	2014–15	2015–16	2016–17
Lockhart ISD Total	\$147,497	\$238,998	\$262,002	\$333,436
Lockhart ISD ESL Percentage of Total Expenditures	0.5%	0.7%	0.7%	0.9%
Lockhart ISD ESL Expenditures per Student	\$29	\$45	\$49	\$59
State ESL Percentage of Total Expenditures	2.0%	2.5%	2.3%	1.8%
State ESL Expenditure per Student	\$171	\$167	\$158	\$124

SOURCE: Texas Education Agency, Public Education Information Management System financial data, school years 2013–14 to 2016–17.

Lockhart ISD’s expenditures for bilingual/ESL education. Lockhart ISD’s expenditures for bilingual/ESL per student and as a percentage of total expenditures are significantly less than state averages.

Figure 2–6 shows the number of bilingual/ESL students and staff at Lockhart ISD from school years 2012–13 to 2016–17. The increase in the number of bilingual/ESL students from school years 2012–13 to 2016–17 was 108.6 percent, and the increase in staff for the same period was 86.7 percent.

A continued increase in the ESL program population without a commensurate increase in support and resources could affect the quality of education provided to ELL students and could negatively affect the district’s accountability ratings. The performance of ELL students on the State of Texas Assessments of Academic Readiness (STAAR) in Lockhart ISD is less than those of the total Lockhart ISD student population, students in Regional Education Service Center XIII (Region 13), and the state. Figure 2–7 shows school years 2013–14 to 2016–17 STAAR performance results for Lockhart ISD’s ELL students.

**FIGURE 2–6
LOCKHART ISD STUDENTS AND STAFF IN BILINGUAL/ENGLISH AS A SECOND LANGUAGE (ESL) EDUCATION
SCHOOL YEARS 2012–13 TO 2016–17**

YEAR	STUDENTS	PERCENTAGE OF TOTAL STUDENTS	STAFF	PERCENTAGE OF TOTAL STAFF
2012–13	475	9.6%	20.3	6.2%
2013–14	591	11.6%	24.9	7.7%
2014–15	711	13.3%	25.7	7.7%
2015–16	749	13.9%	31.6	9.0%
2016–17	991	17.5%	37.9	10.9%

SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2012–13 to 2016–17.

**FIGURE 2–7
LOCKHART ISD ENGLISH LANGUAGE LEARNER STUDENTS’ PERFORMANCE ON TEXAS STATE ASSESSMENT OF ACADEMIC READINESS (STAAR), ALL SUBJECTS, ALL GRADES
SCHOOL YEARS 2013–14 TO 2016–17**

YEAR	PERCENTAGE DISTRICT ELL (1) STUDENTS	PERCENTAGE DISTRICT ALL STUDENTS	PERCENTAGE REGION 13 ELL STUDENTS	PERCENTAGE STATE ELL STUDENTS
2013–14 (2)	53%	73%	57%	57%
2014–15	51%	70%	55%	55%
2015–16 (3)	48%	66%	55%	57%
2016–17 (4)	47%	63%	55%	57%

NOTES:

- (1) English Language Learner
- (2) School years 2013–14 and 2014–15 data is reported as percentage at phase-in satisfactory standard or greater.
- (3) School year 2015–16 data is reported as percentage satisfactory standard or greater.
- (4) School year 2016–17 data is reported as percentage approaches grade level or greater.

SOURCE: Texas Education Agency, Texas Academic Performance Report, school years 2013–14 to 2016–17.

During 2001 and 2002, the Intercultural Development Research Association conducted a national study to identify the characteristics that contribute to high academic performance in bilingual education programs. The study examined 10 school districts and described indicators of successful bilingual education programs. The study included the following indicators: leadership; vision and goals; school climate; linkages between central administration and school-level staff; school organization and accountability; professional development; parent involvement; staff accountability and student assessment; staff selection and recognition; and community involvement. The following summary describes the findings in successful districts, according to each of the characteristics studied:

- Leadership – Each school had principals who were committed to the success of their bilingual education program, had open and frequent communication with staff, and were aware of the rationale for the bilingual education program;
- Vision and Goals – The schools had clear and visible goals. School leadership set expectations for the students and the teaching staff. Teachers, the administration, and sometimes parents were involved in establishing the vision and goals for the program;
- School Climate – All the administration and teaching staff felt responsibility for establishing and maintaining a safe school atmosphere;
- Linkages – Teachers and school administrators did not feel isolated from central administration staff. The roles and responsibilities of central office staff and those of school staff were clear;

- School Organization and Accountability – The bilingual education programs were integral components of the schools’ curriculum. Faculty and staff held themselves accountable for the success of all students;
- Professional Development – Staff considered planning and grade-level meetings as important ways of conducting their professional development. Teachers who had opportunities to travel outside of the district for professional development gave presentations and workshops for other teachers on staff;
- Parental Involvement – Parents were strong advocates of the bilingual education program and were welcomed into the school as partners engaged in meaningful activities within the school. Some businesses near schools granted parents flex time to enable them to participate in school activities held during the school day;
- Staff Accountability and Student Assessment – The schools studied used multiple assessments. Administrators set clear and rigorous standards and achievement levels. Schools used assessments in the native language when appropriate;
- Staff Selection and Recognition – Schools selected teachers for their bilingual education programs based on academic background, experience in bilingual education, proficiency in the target languages, enthusiasm, commitment, and openness to change and innovation. Schools recognized teachers for students’ successes; and
- Community Involvement – Representatives of the community shared school facilities, and schools

built relationships with businesses and community representatives. Many senior citizens and retired individuals participated in activities with the students.

Comparable districts may serve as a model for bilingual/ESL staffing. Bastrop ISD, a district with approximately 9,300 students, employs six bilingual/ESL staff, including the following positions:

- director of ELL programs;
- two elementary ELL instructional specialists;
- secondary ELL instructional specialist;
- bilingual/ESL compliance officer; and
- ELL programs coordinator.

Tomball ISD has information on its website that describes the bilingual education model that the district uses, including its goals, what parents need to know, and periodic updates about the teachers in the program. The information includes activities to help motivate ELL students as they increase their English language proficiency.

Lockhart ISD should implement a process for continuous evaluation of the structure, staffing, instructional delivery, and resources of the district's bilingual/ESL program to meet the needs of the English Language Learner student population.

Considering the large number of ELL students enrolled in Lockhart ISD, their limited academic progress, and the projected increases in bilingual/ESL enrollment, the district should inventory existing bilingual/ESL resources and conduct a needs assessment to determine the needs of bilingual/ESL educators. Based on the gap analysis, the district should develop short-term and long-term plans to provide requested resources.

Lockhart ISD should determine appropriate staffing needs based on student enrollment trends and develop comprehensive job descriptions to guide the roles and responsibilities of newly developed bilingual/ESL staff positions.

The district could implement this recommendation with existing resources.

RESPONSE TO INTERVENTION (REC. 5)

Lockhart ISD lacks procedures to guide an effective response to intervention program that supports struggling learners at all grade levels.

Response to intervention (RtI) is a three-tier system used to provide increasingly intense, research-based interventions and supports to all students. Tier I provides all students with high-quality curriculum, instruction, and behavioral supports in their regular classrooms. Tier II provides for additional targeted, supplemental instruction and interventions in small group settings with other students who require similar supports. The final level, Tier III, includes more intensive and individualized interventions. At Tier III, the school provides interventions and supports to meet a student's unique and individual needs; these services are often provided in an individual setting. The RtI process provides schools with a system for regularly monitoring student progress to determine if instruction and interventions are effective in meeting student needs. The RtI process also includes follow-up to ensure that instruction and interventions were implemented with fidelity.

Lockhart ISD's school year 2017–18 District Improvement Plan (DIP) lists RtI as a critical success factor. The DIP calls for adaptive learning computer software that will target strengths and weaknesses, prescribe interventions, and monitor student progress. For the elementary level, teachers will use Tier I supports through the Fundamental Five, an instructional framework. According to the DIP, students identified as Tier II or Tier III will receive intervention support in groups of eight students or fewer from a Lockhart ISD teacher. District staff will evaluate and adjust the groups at least every nine weeks. The DIP also states that a behavior specialist will provide training to teachers on Tier I and Tier II behavior supports.

At the elementary level, teachers administer Tier I and Tier II interventions in the classroom based on Istation and DreamBox Learning testing results. Istation and DreamBox Learning are adaptive learning computer software programs. Instructional coaches work with classroom teachers to develop reteaching strategies for Tier II instruction. According to onsite interviews, Tier III interventions are considered a pathway to special education. Before a student is eligible for Tier III intervention, an RtI committee meets and approves the intervention.

Although Lockhart ISD has implemented RtI at all elementary campuses, the implementation is not consistent, and each campus has different processes. For example, each campus has a different procedure and meeting agenda for RtI meetings. Some campuses hold RtI meetings weekly, and others have monthly RtI meetings. At some campuses, teachers, counselors, instructional coaches, special education

teachers, and administrators are required to attend RtI meetings for students who are being considered for Tier III. These campuses require teachers to bring data showing interventions that have been attempted, results, action plans, and logs of communications with parents. This requirement is not the case at all campuses, and participants at RtI meetings vary among campuses. When the campus moves the student to Tier III instruction, the interventions and supports for the student also vary by campus. Some campuses hire external tutors, some use instructional aides, and all have extended blocks for additional instruction. Some campuses use outside materials to support reteaching.

According to staff interviews, RtI procedures at the junior high school and high school levels are informal. The junior high school and the high school do not have tiered RtI processes, nor does Lockhart ISD have guidelines for teachers and administrators on appropriate interventions. Individual teachers select students to participate in interventions and the materials and delivery methods used to provide interventions. The junior high school and high school interventions are typically teacher-led tutorials during extended periods throughout the school day or after school. Junior high school and high school teachers conduct interventions without the direction of an RtI handbook, formal guidelines, or assistance from district administration. The district does not have a formal intervention process at the secondary level. Therefore, junior high school and high school students may not receive the assistance needed to succeed unless a teacher chooses to intervene and provide extra instruction and support.

Without consistent instructional assistance, students may struggle to learn the skills necessary to perform work appropriate for their grade levels. The lack of a formal identification and intervention process, without coordination or standardization among the elementary, junior high, and high schools also results in a disconnected and potentially ineffective intervention process. Students entering junior high school and high school in need of additional support may not receive the academic assistance and reinforcement comparable to the support received in elementary school.

Strong RtI programs have specific identification criteria that are used consistently districtwide to determine the types of interventions that are most appropriate for each student at each tier. Successful programs document the interventions that teachers provide and the student responses to the interventions. The interventions are research-based, and campuses engage regularly in discussions about the

interventions and outcomes. RtI programs usually are campus-based, but they receive support and redirection from district administration.

San Antonio ISD includes free resources that districts could use for professional development and for improving their existing RtI programs. Examples of these resources include an explanation of RtI, its goals, and a description of the three-tier intervention model. The website also includes descriptions of RtI in Spanish and staff training resources. The district's website provides links to resources that include instructional strategies and interventions.

The University of Texas at Austin Meadows Center for Preventing Educational Risk operates the Response to Intervention Institute. The institute provides practitioners with resources to assist in implementing a campus-based program, conducting a needs assessment, developing an action plan, promoting teacher collaboration, developing differentiated instruction and intervention, and answering parents' questions.

The American Institutes for Research operates the Center on Response to Intervention. The Center offers suggestions on training to increase the understanding and implementation of RtI. The organization has developed a training module based on the latest research from implementation. The Implementing Response to Intervention training module shows how using effective implementation strategies are critical for successful RtI outcomes. Some implementation strategies the training suggests that could be used in training teachers include the following:

- ensure that teachers have a thorough knowledge of the RtI process;
- ensure that teachers can demonstrate the key skills needed; and
- enable teachers to practice the key skills with feedback.

According to the Center on Response to Intervention, after the training occurs, most of learning how to implement RtI with fidelity takes place in the classroom. Therefore, implementation in the classroom requires more support. The RtI Implementer Series Module 2: Progress Monitoring discusses progress-monitoring strategies such as using brief assessment tools that are valid, reliable, and evidenced-based. Another progress-monitoring strategy is assessing students at regular intervals. For example, districts can use weekly, biweekly, or monthly assessments to promptly identify students who are in the most need of support.

Lockhart ISD should establish a response to intervention process districtwide and regularly evaluate instructional programs used for student interventions for effectiveness. To begin developing an effective RtI process, the assistant superintendent of curriculum and instruction should establish district-level and campus-level RtI teams. These teams should consist of selected district and campus administrators, teachers, and counselors. The teams should establish long-term and short-term goals for establishing a new RtI process to use throughout the district. The teams should research successful RtI programs at other districts and seek the assistance of Region 13 to help establish these goals. As part of developing this process, Lockhart ISD should define the roles and responsibilities of staff with regard to RtI. The district should develop standard processes, systems, and forms for collecting, documenting, and analyzing student outcomes. The district should revise the DIP to include the new districtwide process for identifying students, managing their outcomes, and transitioning from elementary school to junior high school and high school. The DIP should also include a description of the types of data that will be used to inform decisions regarding interventions used with students.

When these steps are in place, the assistant superintendent of curriculum and instruction should develop and implement a process to evaluate the district's intervention programs and determine if they should be incorporated into the district's new RtI process. The teams should develop a plan for professional development to train all teachers regarding the new RtI processes. Lockhart ISD should provide ongoing training for teachers regarding how to effectively implement and document the RtI process on each campus. The district-level and campus-level RtI teams should also present the new RtI procedures to the board and district stakeholders.

No fiscal impact is assumed for ongoing RtI training because the district has a training budget for teachers. The district could implement this recommendation with existing resources.

INSTRUCTIONAL TECHNOLOGY (REC. 6)

Lockhart ISD lacks adequate hardware and technology training to fully support progress toward the district's student achievement goals.

Lockhart ISD's DIP states three goals for educational delivery during school year 2017–18:

- every student in grades one to eight will progress 1.5 years in reading; Performance Objective 1 states

that every campus will increase by 20.0 percent the students in grades one to eight that progress at least 1.5 years in reading;

- every student in grades one to eight will progress 1.5 years in mathematics; Performance Objective 1 states that every campus will increase by 20.0 percent the students in grades one to eight that progress at least 1.5 years in mathematics; and
- for 2018 State of Texas Assessments of Academic Readiness (STAAR) testing, 70.0 percent of students that participate in the end-of-course assessments for English 1 will perform satisfactorily.

To test whether students are meeting the three educational delivery goals stated in the DIP, each campus is required to conduct regular student assessments. Students complete computer assessments on the first of each month in reading. Teachers also administer checkpoint assessments in reading every three weeks that require students to have access to computers. Teaching staff use the results of these assessments to develop student progress reports. Teachers present these results at campus-level team meetings. The assistant superintendent of curriculum and instruction presents the data at board meetings.

Lockhart ISD, however may not have sufficient computers at each campus to support the administration of required assessments. During onsite interviews, staff reported that access to computer labs, classroom computers, and computer carts was limited and that scheduling the assessments was difficult. Scheduling delays often resulted in teachers moving on to new material before students could complete assessments and demonstrate mastery of previously taught material.

Figure 2–8 shows the number and type of computers available to students on each campus in Lockhart ISD. Pride High School has the greatest number of computers with 84 computers for 22 students. Lockhart Junior High School has the smallest number of computers, with 681 computers for 1,292 students. All district campuses, except Pride High School, have fewer computers than students. As a result, it is difficult for campuses to schedule testing time for students, which can delay obtaining reports and assessing student progress.

Lockhart ISD uses a combination of software programs and online platforms to provide all teaching, learning, and assessment components to administrators and educators.

FIGURE 2–8
LOCKHART ISD COMPUTERS PER CAMPUS
SCHOOL YEAR 2017–18

CAMPUS	DESKTOPS	LAPTOPS	TABLETS	CHROMEBOOKS	TOTAL COMPUTERS	TOTAL STUDENTS	AVAILABLE COMPUTERS AS A PERCENTAGE OF TOTAL STUDENTS
Carver Early Education Center	64	52	85	0	201	212	94.8%
Bluebonnet Elementary School	201	61	68	98	428	663	64.6%
Clear Fork Elementary School	184	25	40	38	287	488	58.8%
Plum Creek Elementary School	201	44	75	87	407	550	74.0%
Navarro Elementary School	157	37	27	52	273	457	59.7%
Alma Brewer Strawn Elementary School	50	38	67	120	275	454	60.6%
Lockhart Junior High School	280	153	17	231	681	1,292	52.7%
Lockhart High School	500	380	30	240	1,150	1,523	75.5%
Pride High School	27	27	0	30	84	22	381.8%
Total	1,664	817	409	896	3,786	5,661	66.9%

SOURCES: Texas Education Agency, Texas Academic Performance Report 2016–17; Lockhart ISD, 2018.

Figure 2–9 shows the online platforms used at each Lockhart ISD campus.

Lockhart ISD’s DIP states that, as a critical success factor, the district will provide targeted professional development in English and math on all educational programs. However, according to onsite interviews, the district has not provided sufficient training for the programs used to assess student progress toward the goals in the DIP.

The district started school year 2017–18 using the Istation product for math and English. In October 2017, the district discontinued the use of Istation math and replaced it with DreamBox Learning software. Teachers reported that district administration made this decision with little teacher input and provided limited training while still holding teachers to the same standards for obtaining data on student progress. Teaching staff received training on the DreamBox program from a webinar the week before they began the programs with students. In addition, staff noted that training for the Fundamental Five program was made in a large group setting, and that the trainer gave incorrect and conflicting information that had to be corrected later.

Campus staff reported inconsistency among campuses in the resources used. For example, some campuses continue to use preferred components from previously implemented

resources. Some campuses purchase their own resources for a variety of subject areas. This inconsistency makes it difficult to properly evaluate the instructional programs of the district’s teaching staff, and providing support for districtwide implementation is more challenging.

Lockhart ISD should evaluate the district’s existing technology resources to meet the needs of students and teachers and support the achievement of district goals.

The superintendent should form a committee that includes the assistant superintendent of curriculum and instruction, the assistant superintendent of operations and technology, teachers, and other district leaders. The committee should determine the most efficient method to align technology support and hardware accessibility for students and teachers. The committee should conduct an inventory of all instructional resources, programs, and technology used at each campus and should survey teachers to solicit feedback on the implementation and effectiveness of these resources. The committee should evaluate the hardware available on each campus and move resources as needed to ensure that each campus receives an equitable share of technology assets.

The superintendent should establish a timeline for the committee’s completion and submission of the review and recommendations to the board.

**FIGURE 2–9
LOCKHART ISD DISTRICT ONLINE PLATFORMS AND RESOURCES
SCHOOL YEAR 2017–18**

ELEMENTARY SCHOOLS	JUNIOR HIGH SCHOOL	HIGH SCHOOLS	DISTRICTWIDE
DreamBox Learning	DreamBox Learning	Odyssey Credit Recovery	Google Apps for Education
Istation Reading	Istation Reading	Rosetta Stone	YouTube
Accelerated Reader	Rosetta Stone	Elevation (1)	Learning Ally
Mentoring Minds	Elevation (1)	Notice and Note	Eduphoria (1)
Phonics Dance	Fusion		Skyward (1)
Heggerty	Brain Based Teaching		Texas Essential Knowledge and Skills Resource System
Estrellita	Mix-It-Up		Fundamental Five
Brain Based Teaching	Notice and Note		Neuhaus
Mix-It-Up	Empowering Writers		6 Plus 1 Traits of Writing
Notice and Note			Guided Reading
			Brain Based Teaching
			7 Mindsets

NOTE: (1) Data housing programs.

SOURCE: Lockhart ISD, March 2018; Lockhart ISD, District Improvement Plan, 2017–18.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

- Lockhart ISD has begun addressing and expanding its Gifted and Talented (G/T) program through an increased focus on the identification process. Identified students in elementary grades receive 150 minutes per week of G/T programming as part of a pullout program provided by three G/T teachers who rotate through the five campuses.
- Pride High School is an alternative, self-paced high school that provides students an opportunity to accelerate the high school curriculum and work at their own pace. The focus at Pride High School is to provide a high school education with as few barriers as possible. Because the district spends more per student at Pride High School than at the other campuses, an opportunity exists for the district to evaluate the resources and infrastructure allocated to Pride to ensure efficiency in the delivery of educational services to these students.

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	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 2. EDUCATIONAL SERVICE DELIVERY							
4. Implement a process for continuous evaluation of the structure, staffing, instructional delivery, and resources of the district's bilingual/ESL program to meet the needs of the English Language Learner student population.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
5. Establish a response to intervention process districtwide and regularly evaluate instructional programs used for student interventions for effectiveness.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6. Evaluate the district's existing technology resources to meet the needs of students and teachers and support the achievement of district goals.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 3. HUMAN RESOURCES MANAGEMENT

An independent school district's human resources function is responsible for the management of staff. Human resource management is dependent on the organizational structure of the district. Larger districts may have staff dedicated to human resource management, and smaller districts assign staff these responsibilities as a secondary assignment.

Human resource management includes compensation and benefits, recruitment, hiring and retention, administrative planning and duties, records management, staff relations and grievances, and staff evaluations. These functions are defined by either compliance-based or strategic-based responsibilities. Compliance-based responsibilities include assuring an organization is following federal, state, and local labor laws in areas such as benefits, compensation and hours worked, records management, mandatory leave, discrimination, medical privacy, safety, termination, and eligibility to work. Strategic-based responsibilities include recruiting and retention, compensation and benefits, and staff relations.

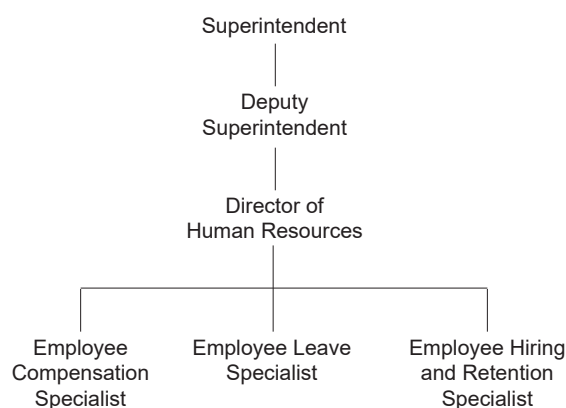
Figure 3–1 shows the Human Resources Department organization of Lockhart Independent School District (ISD). The director of human resources position was added during school year 2017–18. Formerly, the deputy superintendent was the direct supervisor for the other three positions in the Human Resources Department.

Lockhart ISD's Human Resources Department is responsible for the following staff activities:

- posting and updating position vacancy listings;
- conducting background checks of applicants;
- processing new staff;
- monitoring the licensure status for all certified staff;
- maintaining staff files; and
- distributing and collecting staff evaluations.

During school year 2016–17, Lockhart ISD employed 610.2 full-time-equivalent (FTE) positions to provide services to 5,661 students. **Figure 3–2** shows Lockhart ISD's actual payroll expenditures as a percentage of all funds compared to its peer districts in school year 2016–17. Peer districts are districts similar to Lockhart ISD that are used for comparison purposes. Payroll expenditures for all four districts ranged

FIGURE 3–1
LOCKHART ISD ORGANIZATION FOR HUMAN RESOURCES
SCHOOL YEAR 2017–18



SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

from \$29.3 million to \$36.0 million. Lockhart ISD's payroll accounted for 76.5 percent of its total expenditures, which is the second greatest among peer districts and is less than the state average of 80.7 percent.

Figure 3–3 shows the percentage of staff in five categories for Lockhart ISD compared to those of its peer districts. During school year 2016–17, Lockhart ISD employed the greatest percentage of teachers compared to its peer districts but also employed the smallest percentage of educational aides compared to its peer districts.

Figure 3–4 shows the student-to-teacher ratios and student-to-staff ratios for Lockhart ISD and its peer districts. Lockhart ISD has the greatest student–teacher ratio and student–staff ratio compared to its peer districts. Both ratios for Lockhart ISD are also greater than averages for Regional Education Service Center XIII (Region 13) and the state.

FINDINGS

- ◆ Lockhart ISD does not have written procedures for all human resources functions.
- ◆ Lockhart ISD does not have current or accurate job descriptions for all staff.
- ◆ Lockhart ISD's staff records incorrectly include medical information.

**FIGURE 3–2
LOCKHART ISD ACTUAL PAYROLL EXPENDITURES AS A PERCENTAGE OF ALL FUNDS COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2016–17**

CATEGORY	LOCKHART ISD	ALICE ISD	GREENVILLE ISD	MOUNT PLEASANT ISD
Total expenditures (in millions)	\$42.7	\$36.0	\$45.6	\$43.3
Payroll expenditures (in millions)	\$32.7	\$29.3	\$36.0	\$29.9
Payroll as a percentage of total expenditures	76.5%	81.4%	79.0%	69.0%
Total Staff FTE positions	610.2	727.5	764.2	840.7
Total Teacher FTE positions	348.4	323.0	381.8	376.6
Student Enrollment	5,661	5,111	5,354	5,312

NOTE: FTE=full-time-equivalent positions.

SOURCES: Texas Education Agency, Public Education Information Management System, Actual Financial Data, school year 2016–17, and Texas Education Agency Snapshots, school year 2016–17.

**FIGURE 3–3
LOCKHART ISD PERCENTAGE OF STAFF TYPES COMPARED TO PEERS
SCHOOL YEAR 2016–17**

STAFF	LOCKHART ISD	ALICE ISD	GREENVILLE ISD	MOUNT PLEASANT ISD
Teachers	57.1%	44.4%	50.0%	44.7%
Support staff	9.0%	9.0%	11.0%	6.8%
Administrative staff	4.3%	4.6%	4.0%	4.1%
Educational aide	6.9%	12.5%	12.9%	20.1%
Auxiliary staff	22.7%	29.5%	22.2%	24.2%

NOTE: Percentages may not sum to 100.0 percent due to rounding.

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2016–17.

**FIGURE 3–4
STUDENT–TEACHER AND STUDENT–STAFF RATIOS
SCHOOL YEAR 2016–17**

AREA	STUDENT–TEACHER RATIO	STUDENT–STAFF RATIO
Lockhart ISD	16.2	9.3
Alice ISD	15.8	7.0
Greenville ISD	14.0	7.0
Mount Pleasant ISD	14.1	6.3
Region 13	14.6	7.6
State	15.1	7.6

NOTE: Region 13=Regional Education Service Center XIII.

SOURCE: Texas Education Agency, Texas Academic Performance Report, school year 2016–17.

RECOMMENDATIONS

- ◆ **Recommendation 7: Develop and implement written procedures and regulations to guide human resources functions.**
- ◆ **Recommendation 8: Update and maintain all job descriptions and evaluation tools consistently.**

- ◆ **Recommendation 9: Develop a process to ensure that the Human Resources Department stores staff medical information in accordance with federal requirements.**

DETAILED FINDINGS

WRITTEN PROCEDURES (REC. 7)

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

The employee compensation specialist uses the district’s Administrative Procedures Guide Employee Compensation Plan to set salaries for new staff. The guide contains the salary ranges for all positions and explains how to set salaries within that range depending on the credentials of the new staff. Apart from this guide, the district has no written procedures for the other functions performed by the Human Resources Department.

The employee compensation specialist has worked for the district for 19 years, and the employee hiring and retention specialist has been with the district for 14 years. Both

reported that, because of their long tenures at Lockhart ISD, they know how to perform their duties without the aid of written procedures. The employee compensation specialist's duties include setting salaries for new staff and maintaining the office calendar. Before the director of human resources position was filled, the employee compensation specialist also developed the Human Resources Department budget. The employee hiring and retention specialist's duties include posting jobs, maintaining and updating job descriptions, and sending and receiving staff evaluations.

The Legislative Budget Board's School Performance Review Team visited the district in November 2017. At the time of the team's onsite review, the employee leave specialist had been with the district for one month. However, the former employee leave specialist still works at the district as the executive assistant to the deputy superintendent. Based on this previous experience, the district assigned the former employee leave specialist to train the new employee leave specialist. The employee leave specialist determines eligibility of staff for various types of leave.

Effective school districts have comprehensive, documented operating procedures. Documented procedures help districts develop work standards, ensure consistency, and implement overall operational efficiency. Additionally, a detailed administrative procedures manual for operations preserves institutional knowledge if staff is absent or leaves the district. If the previous employee leave specialist had left the district instead of taking a different position within the district, her institutional knowledge of that position would have been lost.

In addition, lack of written procedures may increase the district's vulnerability to litigation. For example, if a district lacks consistency in job postings and interview and vetting procedures, the district's fairness might be questioned in hiring one applicant rather than another. Written procedures would provide more assurance that consistent practices are being followed.

Lockhart ISD is a member of the Texas Association of School Boards (TASB), which offers best practice models and is available to assist school districts with developing procedures and regulations. TASB has an Administrative Procedures Manual that describes procedures with references to legal and local policies. The Administrative Procedures Manual is a guide for developing additional written procedures for human resources functions that include the following topics:

- recruitment;

- job posting;
- federal Office for Civil Rights (OCR) compliance;
- hiring process;
- staff records;
- management of job descriptions;
- management of performance evaluations;
- training in best practices;
- new staff orientation; and
- staff benefits.

The district should develop and implement written procedures and regulations to guide human resources functions.

The Human Resources Department staff should meet and list all of the functions of the department. Staff that are responsible for each function should record the detailed procedures they follow. The director of human resources should review the list and then develop a manual including the detailed procedures. If the Human Resources Department adds new tasks, the director of human resources should develop procedures and add the procedures to the manual. The director of human resources should review the manual each year to ensure that procedures are the same and to determine whether any procedures should be added or discontinued. The district should make the manual accessible on the district's intranet.

The district could implement this recommendation with existing resources.

JOB DESCRIPTIONS (REC. 8)

Lockhart ISD does not have current or accurate job descriptions for all staff.

When the district develops a new position, the supervisor who oversees the position writes the job description and sends it to the employee hiring and retention specialist to use for the job posting. Lockhart ISD stores all job descriptions on the district's intranet. If the district posts a vacancy for an existing position, then the district uses the job description posted on the intranet, unless the supervisor revises it. As a result, the district uses many outdated job descriptions. For example, the job descriptions for the employee compensation specialist and the employee leave specialist were last updated

in May 2010, and the job description for the employee hiring and retention specialist was last updated in December 2009.

Because the district has not updated job descriptions, many descriptions throughout the district do not accurately reflect the current responsibilities for the positions. For example, each staff in the Human Resources Department has a distinct job title and distinct roles; however, each of the job descriptions for those positions are virtually identical. The job descriptions for each position state the primary purpose of the positions as “Facilitates the efficient operation of the assigned office. Handles confidential information and frequent contact with all levels of district employees, outside agencies, parents, and the general public.” In addition, the heading “Major Responsibilities and Duties” lists 33 identical responsibilities for all three positions. The responsibilities are all general, such as “Organizes and manages routine work activities of an assigned office or for assigned position” and “Demonstrates thoroughness and attention to detail in carrying out job assignments.” The descriptions do not list the actual job responsibilities that the three staff detailed during the onsite interviews. The only differences among the job descriptions for the three staff are included as “Other Duties”; however, the duties are vague and do not include specific tasks that the positions perform.

In contrast, the job descriptions for the director of human resources and the deputy superintendent have specific tasks that match what each position performs. The positions were new; therefore, the district developed new job descriptions for those roles. However, no procedure is in place to update the job descriptions.

In addition to job postings, the district uses job descriptions for annual staff evaluations. The employee hiring and retention specialist sends evaluations to all supervisors each spring. The evaluations ask the supervisors to rate staff using a scale based on the duties shown in the job description. Because a number of these job descriptions are obsolete and do not include all key tasks for each staff, the result is that supervisors do not have adequate tools for properly evaluating staff.

Job descriptions are addressed in several state and federal statutes, including the following:

- Fair Labor Standards Act (FLSA) – The federal FLSA requires overtime pay for more than 40.0 hours worked in a week by nonexempt staff. The exempt or nonexempt status of staff is determined, in part, on staff’s duties. A written job description or title alone is

not sufficient to satisfy the requirements for an exempt status, but an accurate list of essential functions could provide documentation in confirming staff’s exempt status;

- Americans with Disabilities Act (ADA) – The federal ADA requires employers to provide reasonable accommodation to the known physical or mental limitations of a qualified individual with a disability, unless to do so would impose an undue hardship on the employer. The duty to accommodate relates to the staff’s essential job duties. The disabled staff must be able to perform the essential functions of the job, with or without accommodation. If a disabled staff is unable to perform an essential function of the job, even with an accommodation, the employer is not required to retain the staff in that position. In this regard, it is important that a job description identifies the position’s essential functions;
- Federal and state discrimination laws – Many state and federal statutes prohibit discrimination based upon a protected status. When faced with a claim of discrimination from staff, a well-written job description could support the challenged decision, whether it is related to compensation, promotion, discipline, or discharge; and
- Family and Medical Leave Act (FMLA) – The federal FMLA requires that the staff’s healthcare provider certifies that the medical condition for which the staff seeks leave renders the staff unable to perform one or more job functions. FMLA further provides that, in accordance with specified conditions, an employer may require certification from the staff’s healthcare provider recommending a return to work before the employer must return the staff to work following leave. To assist the provider in this assessment, the employer may attach a job description to the medical certification form. A complete and accurate list of essential functions enables the provider to give an informed opinion.

Although no federal or state law requires job descriptions, they are an important tool in effective organizational management. Job descriptions facilitate compliance with applicable statutes and policies. A thorough job description outlines the necessary skills, training, and education needed for the position. It also identifies the duties and responsibilities of the job. Effective job descriptions serve as a basis for

interviewing candidates, orienting new staff, and evaluating job performance.

Figure 3–5 shows an example of a job description template that includes industry-standard information from the Society for Human Resource Management, a professional society for the human resources field. Job descriptions typically include essential duties and responsibilities, qualifications needed to perform the job, and the physical demands required to perform the job.

**FIGURE 3–5
JOB DESCRIPTION EXAMPLE
2018**

Job Title:	Prepared/Revised Date:
Division:	Approved By:
Job Classification:	Approved Date:
Pay Grade/Step:	Board Action Required: Y/N

Reports to:

General Statement of Job:

Essential Duties and Responsibilities: (Other duties may be assigned)

Supervisory Responsibilities:

Qualifications:

Examples of Work:

Required Knowledge, Skills, Abilities:

Certificates, Licenses, Registrations:

Other Desirable Qualifications:

Physical Demands:

Work Environment:

Terms of Employment:

Evaluation Criteria:

SOURCES: Legislative Budget Board School Performance Review Team, 2018; Society for Human Resource Management, 2015.

The district should update and maintain all job descriptions and evaluation tools consistently.

The director of human resources should instruct all staff to identify all position-related tasks that they perform. Each supervisor should review the tasks with staff, update the job descriptions, and submit them to the employee hiring and retention specialist for review and filing. The employee hiring and retention specialist should use the new job descriptions to update the evaluation tools for each staff.

Supervisors should update job descriptions for staff each time a position has a task added or removed. The supervisors should send the updated descriptions to the employee hiring and retention specialist for review, filing, and updating of the evaluation tool. Supervisors should also review each job description during the summer, then submit it to the employee hiring and retention specialist for review and updating.

The director of human resources should develop a written procedure for developing and updating job descriptions and add the procedures to a Human Resources Department procedures manual.

The district could implement this recommendation with existing resources.

MEDICAL RECORDS (REC. 9)

Lockhart ISD’s staff records incorrectly include medical information.

Before school year 2017–18, Lockhart ISD maintained paper records for all staff. During school year 2016–17, the district scanned and converted all of the records into digital records using a document information management system called Laserfiche. The district stored all of the paper files in a vault and contracted with a vendor to dispose of these records during school year 2017–18. The Human Resources Department ceased initiating paper records for all new staff and stores all new staff records digitally on the district’s network.

During the onsite visit, the review team reviewed a sample of digital staff records. All of the digital staff record folders contained subfolders labeled medical information. According to onsite interviews, the district includes the medical information subfolder to store medical information provided by staff. Many of these subfolders contained medical information in connection with an FMLA claim or an ADA claim. The employee leave specialist processes these claims and places the documentation into staff records. All Human Resources Department staff can access the digital staff record folders and the medical information subfolders.

Lockhart ISD’s practice of storing medical information in the staff record folders does not meet ADA requirements. The ADA requires employers to keep medical records and staff medical information separate from nonmedical records. In accordance with ADA, only staff that require this information, which is typically one or two designated positions, may have access to such medical information.

Including medical information with the standard staff records opens the district to potential litigation.

Effective school districts establish two sets of records for staff. One set is specifically for medical records and is accessible only by one or two Human Resources Department staff. The other set of staff records includes all other information that a standard staff file should include.

The district should develop a process to ensure that the Human Resources Department stores staff medical information in accordance with federal requirements.

The employee leave specialist should develop separate medical files for each district staff and move all existing medical information into these files. The employee leave specialist should place all future medical information in these files. The director of human resources should ensure that access to these files is restricted to the employee leave specialist and the director of human resources.

The district could implement this recommendation with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 3. HUMAN RESOURCES MANAGEMENT							
7. Develop and implement written procedures and regulations to guide human resources functions.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
8. Update and maintain all job descriptions and evaluation tools consistently.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9. Develop a process to ensure that the Human Resources Department stores staff medical information in accordance with federal requirements.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 4. BUSINESS SERVICES

An independent school district's business services functions include financial management, asset and risk management, and purchasing. Financial management involves administering the district's financial resources, budgeting, and planning for its priorities. Asset and risk management functions control costs by ensuring that the district adequately protects its assets against significant losses at the lowest possible cost. An independent school district's purchasing function provides quality materials, supplies, and equipment in a timely, cost-effective manner.

Financial management is dependent on a district's organizational structure. Larger districts typically have staff specifically dedicated to financial functions, and smaller districts have staff with multiple responsibilities. Budget preparation and administration are financial management functions that are critical to overall district operations. These functions include budget development and adoption; oversight of expenditure of funds; and involvement of campus and community stakeholders in the budget process. Managing accounting and payroll includes developing internal controls and safeguards; reporting account balances; and scheduling disbursements to maximize funds. Management of this area includes segregation of duties, use of school administration software systems, and providing staff training.

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

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

structure of the district. Larger districts typically have staff dedicated to asset and risk management, and smaller districts assign staff these responsibilities as a secondary assignment.

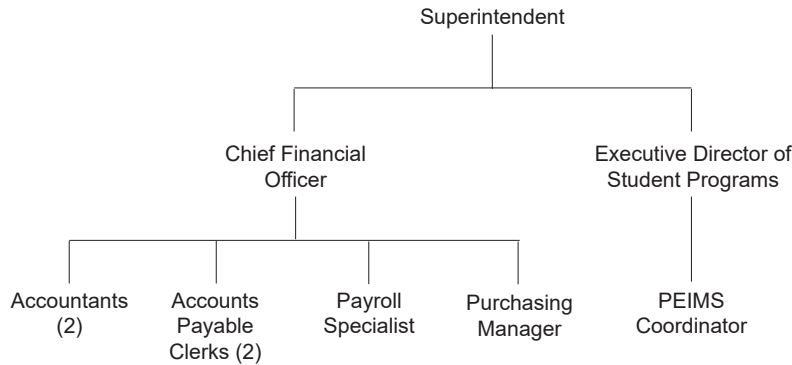
School districts in Texas also are required to follow federal and state laws and procedures applicable to purchasing. The purpose of competitive bidding requirements in the Texas Education Code, Section 44.031, are to stimulate competition, prevent favoritism, and secure the best goods and services needed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

Lockhart Independent School District's (ISD) chief financial officer (CFO) oversees the Business and Finance Department, which is responsible for the district's accounting, purchasing, and risk-management functions. The CFO also serves as the financial adviser to the superintendent and the Board of Trustees. The CFO supervises two accountants, two accounts payable clerks, a payroll specialist, and a purchasing manager. The accountants reconcile bank accounts, review the accounts payable clerks' work, and assist the CFO to produce the district's financial statements. The accounts payable clerks maintain accounting records and process vendor invoices, and the payroll specialist processes payroll. The purchasing manager reviews purchase requests, determines options related to requests, and ensures that the district complies with the purchasing requirements. The Public Education Information Management System (PEIMS) coordinator, a position outside of the Business and Finance Department, supervises the PEIMS clerks on each campus. **Figure 4–1** shows the financial management organization for Lockhart ISD.

Figure 4–2 shows Lockhart ISD's fund balances for school years 2014–15 to 2016–17. A fund balance is the amount of district assets in excess of liabilities. These assets could include investments, delinquent taxes, accounts receivable, and inventories.

TEA recommends a minimum unrestricted fund balance of approximately two-and-a-half months of operating expenditures. Lockhart ISD's fund balance met this standard for fiscal years 2015, 2016, and 2017. The fund balance has

**FIGURE 4-1
LOCKHART ISD FINANCIAL MANAGEMENT ORGANIZATION
SCHOOL YEAR 2017-18**



NOTE: Organization is shown at the time of the Legislative Budget Board School Performance Review Team’s onsite review. Since the time of the review, the district moved the Public Education Information Management System (PEIMS) coordinator position to report to the deputy superintendent.

SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

**FIGURE 4-2
LOCKHART ISD GENERAL FUND BALANCES
SCHOOL YEARS 2014-15 TO 2016-17**

CATEGORY	2014-15	2015-16	2016-17
Beginning Fund Balance	\$13,721,659	\$14,856,295	\$14,804,000
Ending Fund Balance	\$14,856,295	\$14,804,000	\$15,047,096
Increase/(Decrease)	\$1,134,636	(\$52,295)	\$243,096
Percentage change from previous year	8.3%	(.004%)	1.6%

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2014-15 to 2016-17.

increased every year except for school year 2015-16, due to capital outlays related to facilities construction.

Figure 4-3 shows Lockhart ISD’s actual financial data for school years 2014-15 to 2016-17 and budgeted financial data for school year 2017-18. The top expenditure categories for each of these years are instruction and plant maintenance and operations. School leadership, capital outlay, and general administration also were significant expenditure categories during these years. For school year 2017-18, Lockhart ISD’s adopted budget is \$54.4 million.

The Legislative Budget Board’s School Performance Review Team selected three school districts, Alice ISD, Greenville ISD, and Mount Pleasant ISD, as peer districts for Lockhart ISD. Peer districts are school districts similar to Lockhart ISD used for comparison purposes. Figure 4-4 shows Lockhart ISD’s tax rate for tax years 2015 to 2017 compared

to the peer districts. The tax rate, set by the local district pursuant to the taxation laws of the state, drives local revenue.

Figure 4-4 shows that Lockhart ISD had a higher tax rate than two of its peer districts for tax year 2016 and a lower tax rate than its peers for tax year 2017.

School districts in Texas receive two financial accountability ratings, including the School Financial Integrity Rating System of Texas (FIRST) and Smart Score. FIRST is Texas’ school financial accountability rating system intended to hold public schools accountable for the quality of their financial management practices, and for the improvement of those practices. The goal of FIRST is to encourage Texas school districts to provide the maximum allocation possible for direct instructional purposes. The Smart Score rating measures academic progress and spending at Texas’ school districts and campuses. The Smart Score ratings range from one to five stars, with five being the best, indicating a district’s

**FIGURE 4–3
LOCKHART ISD ACTUAL AND BUDGETED FINANCIAL DATA
SCHOOL YEARS 2014–15 TO 2017–18**

CATEGORY	2014–15 ACTUAL	2015–16 ACTUAL	2016–17 ACTUAL	2017–18 BUDGETED
Revenue				
Local Tax	\$15,157,850	\$14,335,017	\$15,132,572	\$15,801,802
Other Local and Intermediate	\$2,074,893	\$2,614,434	\$2,356,602	\$798,354
State	\$30,900,874	\$32,808,844	\$34,491,664	\$34,856,618
Federal	\$5,925,067	\$5,873,926	\$6,453,507	\$3,230,563
Total Revenue	\$54,058,684	\$55,632,221	\$58,434,345	\$54,687,337
Expenditures				
11 Instruction	\$25,665,644	\$26,533,030	\$28,278,325	\$26,073,945
12 Library and Media Services	\$663,126	\$655,520	\$711,878	\$721,963
13 Curriculum and Staff Development	\$345,821	\$406,466	\$607,018	\$848,606
21 Instructional Leadership	\$706,565	\$674,231	\$645,739	\$647,664
23 School Leadership	\$2,645,283	\$2,931,899	\$3,003,323	\$3,035,954
31 Guidance and Counseling Services	\$1,713,423	\$1,759,956	\$1,721,698	\$1,236,553
32 Social Work Services	\$108,886	\$112,668	\$152,466	\$152,844
33 Health Services	\$430,146	\$425,060	\$428,546	\$371,482
34 Transportation	\$2,047,507	\$1,827,891	\$2,087,285	\$2,029,300
35 Food	\$3,018,475	\$3,157,987	\$3,482,505	\$3,317,015
36 Extracurricular	\$1,341,520	\$1,327,535	\$1,480,717	\$1,406,430
41 General Administration	\$2,195,184	\$1,870,804	\$1,852,039	\$2,025,278
51 Plant Maintenance and Operations	\$4,317,645	\$4,688,893	\$4,550,139	\$4,849,689
52 Security and Monitoring	\$115,895	\$144,150	\$152,588	\$126,196
53 Data Processing Services	\$185,361	\$311,673	\$405,230	\$513,413
61 Community Services	\$9,790	\$6,534	\$44,574	\$14,160
72 Debt Service	\$3,920,693	\$5,437,759	\$5,643,566	\$5,653,635
81 Capital Outlay	\$6,074,046	\$33,891,455	\$22,905,510	\$1,341,307
Total Expenditures	\$55,505,010	\$86,163,511	\$78,153,146	\$54,396,434

NOTE: The category numbers are the numerations used by the Texas Education Agency to classify expenditures.

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2014–15 to 2017–18.

**FIGURE 4–4
LOCKHART ISD TAX RATE COMPARED TO PEER DISTRICTS
TAX YEARS 2015 TO 2017**

DISTRICT	2015	2016	2017
Lockhart ISD	1.1429	1.3305	1.2174
Alice ISD	1.2611	1.286	1.4543
Greenville ISD	1.3550	1.3482	1.2449
Mount Pleasant ISD	1.2120	1.2120	1.2470

SOURCE: Texas Education Agency, Public Education Information Management System Financial Data, school years 2015–16 to 2017–18.

success in combining cost-effective spending with the achievement of measurable student academic progress. Smart Score lists academic and spending ratings as low, average, or high. The district and campus Smart Score calculations use three-year averages to calculate more stable and consistent measures with less year-to-year volatility. The 2017 Smart Score rating results use data from school years 2013–14 to 2016–17.

Figure 4–5 shows Lockhart ISD’s FIRST and Smart Score ratings compared to peer districts. Lockhart ISD and all three peer districts scored a FIRST rating of A/Superior for school year 2016–17. Lockhart ISD has scored A/Superior

for each of the last five years, except school year 2014–15, when the top rating for FIRST was Pass. During school year 2016–17, Lockhart ISD received a 2.5 Smart Score, with an academic performance rating of very low academic progress and a spending rating of average. Lockhart ISD’s school year 2016–17 Smart Score rating is lower than two of its peer districts.

Oversight of Lockhart ISD’s asset and risk management activities is primarily with the CFO and the superintendent, with support from Business and Finance Department staff. The district keeps most of its idle cash in interest-bearing accounts at its local depository bank. The CFO transfers funds between accounts at the depository bank as needed to cover payroll and accounts payable checks.

ACCOMPLISHMENTS

- ◆ Lockhart ISD developed financial management systems that promote transparency, accountability, and efficiency.
- ◆ Lockhart ISD encouraged all staff to change payroll receipt from paper checks to direct deposit.
- ◆ Lockhart ISD developed a Business Office Procedures Manual that details all procedures in the department.

FINDINGS

- ◆ Lockhart ISD lacks internal controls of payments to contracted vendors.
- ◆ Lockhart ISD lacks a systematic process for cross-training staff to perform critical financial management functions.

RECOMMENDATIONS

- ◆ **Recommendation 10: Develop and implement formal, districtwide procedures for the approval**

of contracted vendor invoices and communicate procedures to all district staff who manage contracts.

- ◆ **Recommendation 11: Ensure that more than one staff is trained to perform essential financial management duties.**

DETAILED ACCOMPLISHMENTS

FINANCIAL ACCOUNTABILITY AND EFFICIENCY

Lockhart ISD developed financial management systems that promote transparency, accountability, and efficiency. Examples include purchasing processes that promote efficient use of resources. Another example is detailed procedures that promote accountability, consistency, and staff understanding of the district’s financial practices. The district consistently has earned Superior ratings from TEA on its School FIRST assessments. Additionally, the Government Finance Officers Association’s Certificate of Achievement for Excellence in Financial Reporting Program has recognized Lockhart ISD for the past 12 years.

DIRECT DEPOSIT

Lockhart ISD encouraged all staff to change payroll receipt from paper checks to direct deposit. The district distributed a memorandum to all staff, followed up with the staff, obtained their depository bank information, and informed them of the date that the direct deposit would begin into staff accounts. According to the payroll specialist, this process has resulted in a substantial decrease in time and expense for the district in processing monthly payroll, and the department now processes five or six paper paychecks per pay period.

BUSINESS OFFICE PROCEDURES MANUAL

Lockhart ISD developed a Business Office Procedures Manual that details all procedures in the department. The manual includes the district’s purchasing, payroll, campus

**FIGURE 4–5
LOCKHART ISD FIRST AND SMART SCORE RATINGS COMPARED TO PEER DISTRICTS
SCHOOL YEAR 2016–17**

DISTRICT	FIRST RATING	SMART SCORE	SMART SCORE ACADEMIC PERFORMANCE RATING	SMART SCORE SPENDING RATING
Lockhart ISD	A=Superior	2.5	Low academic progress	Average spending
Alice ISD	A=Superior	1	Very low academic progress	Very high spending
Greenville ISD	A=Superior	4	High academic progress	Low spending
Mount Pleasant ISD	A=Superior	3	High academic progress	High spending

NOTE: FIRST=Financial Integrity Rating System of Texas.
SOURCES: Texas Education Agency, Financial Integrity Rating System of Texas, school years 2016–17; Texans for Positive Economic Policy, 2017 Smart Scores.

activity fund, and general accounting procedures. The Business Office Procedures Manual covers procedures related to allowable purchases, ethics, gifts of public funds, and fraud prevention. District staff utilize the manual as a valuable resource for decision making. Business and Finance Department staff, teachers, and administrators indicated a clear and consistent understanding of purchasing procedures. Numerous staff stated that they refer to the Business Office Procedures Manual for guidance on any questions related to purchasing or general accounting-related procedures.

DETAILED FINDINGS

VENDOR PAYMENTS (REC. 10)

Lockhart ISD lacks internal controls of payments to contracted vendors.

Lockhart ISD's purchasing manager is responsible for procurement for the district. The district requires competitive bidding for purchases of \$50,000 or more. The purchasing manager prepares a formal solicitation based on specifications that must be approved by the board. After the board approves, the purchasing manager negotiates contract terms and conditions with the vendor.

The district has several multiyear contracts with vendors. During school year 2011–12, Lockhart ISD contracted with a transportation services vendor to operate and maintain the district's bus fleet, structure bus routes, establish a driver safety program, and perform other transportation services. During school year 2016–17, the district contracted with a food service management company (FSMC) to manage the district's food services operations, including menu planning, food production, nutritional analyses, and catering activities. For school year 2017–18, the superintendent assigned the assistant superintendent of operations and technology to oversee the Food Services Department and the Transportation Department and to serve as the district liaison between the departments' vendors and the superintendent.

Although the district has a formalized process for procurement, the district has not established procedures to ensure that payments for contracted services are accurate and authorized. Onsite interviews indicate internal confusion as to which district staff are responsible for validating that the vendor invoices are for actual services performed and that contract deliverables are met.

According to interviews with Business and Finance Department staff, the purchasing manager is responsible for

processing and reviewing payments to contracted vendors. The purchasing manager receives invoices from the transportation vendor and the FSMC, and reviews the invoices to verify that the invoices are correct and that the billing rates match the rates agreed to in the contracts. If the billing rates are accurate, the purchasing manager submits the payment for approval to the CFO. The purchasing manager and the CFO stated that the assistant superintendent of operations and technology is responsible for verifying that the vendors performed the actual services shown in the invoices. However, the assistant superintendent of operations and technology stated that he does not review invoices and does not participate in financial oversight of contracts. The assistant superintendent of operations and technology indicated that his oversight of the vendors is limited to monitoring operational performance through cafeteria site visits and meetings with vendor staff.

If the district does not ensure that staff who directly oversee vendor contracts are involved in approving invoices, the district risks making payments to vendors for services that were not received or payments for unauthorized work. Effective school districts establish contract-monitoring procedures that enable staff to assess contractor performance and compliance with contract terms and expectations before payment of invoices.

The Texas Contract Management Guide (CMG), published by the Texas Comptroller of Public Accounts, provides best practices for improving contract management processes and practices. The CMG states that "the costs incurred by the contractor should be in accordance with the contract rate schedule. Invoices should be reviewed to ensure that the contractor's billing coincides with the contract's progress. Costs incurred or invoices submitted, in and of themselves, are insufficient indicators of the contractor's progress." The CMG further states that invoices should be approved by program staff before payment, and the invoice should be reviewed to ensure the following elements:

- the contractor is billing only for goods or services received;
- goods or services have been inspected and accepted;
- the invoice is correct and complies with the pricing, terms, and conditions of the contract; and
- total payments do not exceed the contract limits.

Lockhart ISD should develop and implement formal, districtwide procedures for the approval of contracted vendor

invoices and communicate procedures to all district staff who manage contracts. To implement this recommendation, the CFO should determine a workflow for approving contract payments that includes a step for program staff to review and approve vendor invoices before payment. The CFO should document the procedures for approving invoices in the Business Office Procedures Manual.

The district could implement this recommendation with existing resources.

CROSS-TRAINING (REC. 11)

Lockhart ISD lacks a systematic process for cross-training staff to perform critical financial management functions.

When the Business and Finance Department hires new staff, the CFO trains the new staff on the position's job duties. Each position also has a procedures manual that details specific job duties and how to perform them; however, not all Business and Finance Department staff are cross-trained to perform the duties of other positions in the department.

As a result, when positions become vacant, important Business and Finance Department functions are not performed. For example, according to onsite interviews, the Business and Finance Department did not perform bank account reconciliations for four months during school year 2016–17 because the accountant responsible for bank reconciliations no longer worked for the district. The accountant role compiles and analyzes financial information to prepare entries to accounts, such as general ledger accounts, and documenting business transactions. The role also is charged with maintaining the proper recording of revenues and expenditures and establishing acceptable accounting procedures according to TEA's Financial Accountability System Resource Guide.

Additionally, for the CFO and the PEIMS data management function, no alternate position is cross-trained and no procedures are documented. During onsite interviews, staff indicated that the accountant would be the position to assume the responsibilities of the CFO if the CFO were to retire or leave the district. However, no written procedures are documented for the CFO's responsibilities, and it is unclear if the accountant is cross-trained on all of the CFO's duties. The PEIMS coordinator function is outside the Business and Finance Department, but it has critical responsibilities related to the district's financial management. The PEIMS coordinator oversees reporting of data to TEA, which affects compliance with state laws and state funding

allocated to the district. The district does not have a procedures manual for this position, and no other staff is trained to perform the functions in this area.

Considering the small size of Lockhart ISD's Business and Finance Department, deficiencies in cross-training increase the risk that critical processes could be delayed or performed inaccurately if staff leave the district or are unable to perform their duties. Effective cross-training ensures that critical functions continue when staff who regularly perform the tasks are unavailable or leave the organization.

Area Development, published by the Small Business Administration (SBA), sets the following guidelines for developing a successful cross-training program master plan:

- identify the specific critical tasks for which cross-training is needed;
- identify the proper staff who will be capable of performing the cross-training tasks;
- explain the reason for cross-training, and identify benefits to staff to address any apprehension or assumptions that may exist among staff being trained and staff whose job function is being cross-trained;
- allocate adequate funds, time, training materials, and training facilities to accomplish the cross-training;
- reduce the workload to the extent possible during the training process, because the new staff will need adequate time to become proficient at a task;
- develop a recognition and reward program for staff who satisfactorily complete cross-training;
- present cross-training as an integral part of the overall professional staff development plan; and
- plan for periodic cross-training updates or refresher training sessions.

Lockhart ISD should ensure that more than one staff is trained to perform essential financial management duties. The district should have a sufficient level of cross-training of duties so that the payroll, accounts payable, and financial reporting functions continue to operate without interruption when staff leave or retire.

The CFO should develop and implement an action plan, with requisite procedures and processes, to cross-train each staff in the Business and Finance Department with another staff to cover each function. The action plan should

incorporate the recommended cross-training steps outlined by the SBA. The CFO should confer with the Business and Finance Department staff to develop, plan, and schedule for cross-training all critical functions in the department. The cross-training should occur during nonpeak times and should be repeated as often as necessary until staff adequately learn other positions' job functions.

The deputy superintendent should ensure that the duties of the PEIMS coordinator are documented and should direct the PEIMS coordinator to cross-train another district staff regarding PEIMS procedures.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

- Experienced and new principals have varying authority to transfer funds among object codes for campus budgets. Based on interviews with district principals, new principals often were unaware that they could transfer funds among codes to cover budget overages. The principals stated that the CFO conducted informal instruction with each of them regarding how to perform the process, and that their lack of understanding had led to some confusion in the past.
- Lockhart ISD requires purchase orders, approvals, and signatures for any purchase made by a teacher, including low-priced items. Based on interviews with teachers, the purchase order process often requires up to two weeks from the initial request. Teachers stated that often they purchase the necessary supplies with their own funds if they need the materials or supplies quickly. The district has a robust purchasing process that includes appropriate internal controls. However, an opportunity exists to streamline the approval process for low-priced items such as supplies and materials that are purchased regularly by district teachers.
- The district successfully transitioned from a manual purchasing process to an electronic purchase order system to improve workflow efficiency. However, the

new process still includes a final approval that requires the requestor to sign a paper form and upload it to the system before the CFO can approve the purchase order. Automating this last step in the process could further reduce the timing for the CFO to approve purchase orders.

- The district's Community Education Department operates a daycare available to student mothers and district staff. The daycare services are free for district students. District staff pay a market rate for the service. The daycare has the capacity to enroll 45 children in the program. However, the daycare is operating at approximately one-half of this capacity. Opening the daycare to the public to operate at full capacity could be an opportunity to mitigate the amount of annual financial losses associated with operating 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	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 4. BUSINESS SERVICES							
10. Develop and implement formal, districtwide procedures for the approval of contracted vendor invoices and communicate procedures to all district staff who manage contracts.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11. Ensure that more than one staff is trained to perform essential financial management duties.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 5. TRANSPORTATION

An independent school district's transportation function transports students to and from school and other school-related activities. This function is regulated by federal and state laws related to funding, vehicle type, driver education, and safety issues. Districts implement these regulations, budget and allocate resources, and establish operational procedures for bell schedules, bus routes, and transportation fleet maintenance.

Managing transportation operations is dependent on the organizational structure of the district. Districts may either contract for or self-manage their transportation operations. Using a contracted management model, districts rely on the company to provide supervision of its transportation operation. In this arrangement, a district may rely on the company to provide all or some staff, or it may use district staff for its operations. Using the self-management model, a district manages transportation functions without assistance from an outside entity. Managing transportation operations requires planning; state reporting and funding; training and safety; and vehicle maintenance and procurement. Primary transportation expenditures include capital investments in vehicle fleets, and annual costs of maintenance and operations. State transportation funding relies on a district's annual submission of certain transportation reports to the Texas Education Agency (TEA), which is determined by a formula that includes the number and type of students transported.

Lockhart Independent School District (ISD) contracts for its transportation operations with Student Transportation Specialists, a transportation management company. At the time of the review, Lockhart ISD's contract with the transportation management company was for a three-year term from July 1, 2015, to June 30, 2018. The contract enables the district to renew the contract for two additional one-year terms.

The district's assistant superintendent of operations and technology oversees the Transportation Department. The assistant superintendent of operations and technology also oversees the district's food services, facilities, and maintenance functions and reports directly to the superintendent. The Transportation Department staff are employed by the transportation management company, and they include the general manager, administrative assistant, router and special

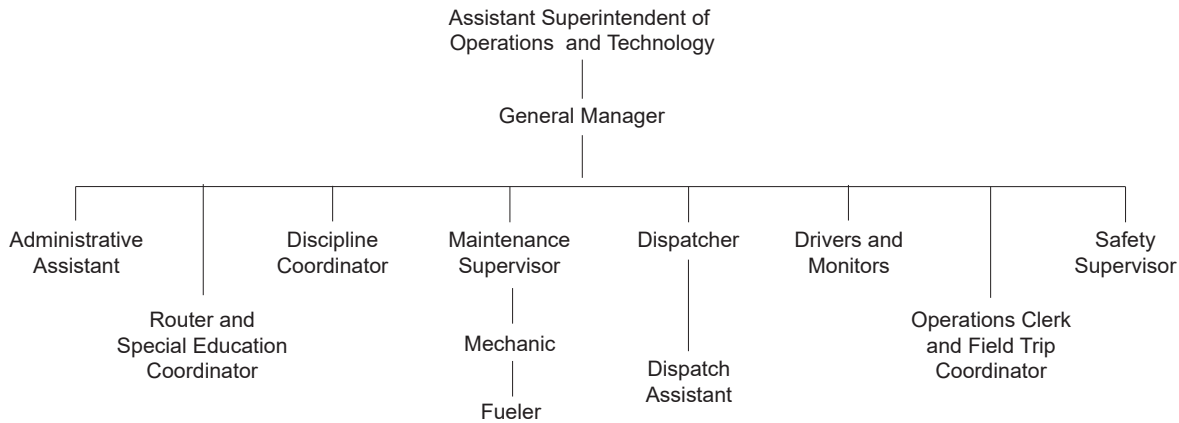
education coordinator, maintenance supervisor, fueler, mechanic, safety supervisor, discipline coordinator operations clerk and field trip coordinator, dispatcher, dispatch assistant, bus drivers, and monitors. The transportation management company staff are officed at the district's transportation fleet maintenance facility. **Figure 5–1** shows the organizational structure of the Lockhart ISD Transportation Department.

The Transportation Department serves the routes to and from school each day and coordinates transportation for athletics and extracurricular trips. The Lockhart ISD transportation fleet maintenance facility includes a maintenance building and a parking facility surrounded by a security fence and is adjacent to the Carver Early Education Center. The maintenance building provides staff offices, meeting rooms, and two work bays for performing maintenance on route buses, spare buses, and district vehicles. The spare parts inventory storage, maintenance records, and office space for the maintenance supervisor and mechanic are located in an area within the maintenance bays. The transportation fleet maintenance staff perform most repairs to the district-owned buses and other district vehicles. The transportation facility has a fuel point that dispenses diesel fuel. Fleet vehicles requiring unleaded fuel use district fuel cards at local gas stations.

Lockhart ISD provides regular school bus route service using a two-tier routing system in which each bus operates one route in the morning and one route in the afternoon. At the time of the onsite review, Lockhart ISD's school bus fleet included 32 regular route buses, nine special education route buses, three activity buses, and nine spare route buses.

Figure 5–2 shows the key measures of the peer districts' transportation services compared to Lockhart ISD. Peer districts are districts similar to Lockhart ISD that are used for comparison purposes. The peer districts for Lockhart ISD are Alice, Greenville, and Mount Pleasant ISDs. **Figure 5–2** shows that Lockhart is more efficient than its peers in cost per student rider and cost per mile for both special and regular programs. Lockhart ISD's cost per student rider is \$849, which is less than the peer district average of \$1,266. However, Lockhart ISD's annual cost per bus was greater than those of all the peer districts.

**FIGURE 5-1
LOCKHART ISD TRANSPORTATION SERVICES ORGANIZATION
SCHOOL YEAR 2017-18**



NOTE: The assistant superintendent of operations and technology is the only Lockhart ISD Transportation Department staff. All other positions are employed by Student Transportation Specialists.
 SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD; Student Transportation Specialists, November 2017.

**FIGURE 5-2
LOCKHART ISD AND PEER DISTRICTS OPERATING DATA COMPARISON
SCHOOL YEAR 2016-17**

DISTRICT	COSTS	BUSES	HOME-TO-SCHOOL STUDENT RIDERS	COST PER STUDENT RIDER	ANNUAL COST PER BUS BASED ON TOTAL BUSES	COST PER MILE		AVERAGE STUDENTS PER BUS
						REGULAR PROGRAM	SPECIAL PROGRAM	
Alice ISD	\$1,037,628	35	607	\$1,709	\$29,647	\$4.23	\$3.72	17.3
Greenville ISD	\$1,455,305	43	1,258	\$1,157	\$33,8447	\$3.55	\$4.40	29.3
Mount Pleasant ISD	\$2,375,490	60	2,552	\$931	\$39,592	\$4.04	\$4.40	42.5
Peer Average	\$1,622,808	46	1,472	\$1,266	\$34,361	\$3.94	\$4.17	29.7
Lockhart ISD	\$2,716,744	54	3,200	\$849	\$50,310	\$2.45	\$2.37	59.3
Over (Under) Peer District Average	\$1,093,936	8	1,728	(\$417)	\$15,949	(\$1.49)	(\$1.80)	29.6

SOURCES: Texas Education Agency, School Transportation Operations and School Transportation Route Services Reports, school year 2016-17.

Local and state transportation sources fund the Lockhart ISD school transportation program. To receive state funding, Lockhart ISD annually submits the School Transportation Route Services Report and School Transportation Operations Report to TEA. These reports include information including the number and type of students transported. This information is applied to a state formula that generates an annual allocation of state funds. These reports show that Lockhart ISD provided home-to-school and school-to-home regular and special program transportation for 3,200 students across all grade levels during school year 2016-17.

TEA allocates transportation funding for regular program students using the preceding school year’s linear density and cost per mile. The Texas Education Code, Section 42.155, defines regular program students as students who reside two or more miles from their school of regular attendance. Cost per mile is based on data submitted in the School Transportation Route Services Report and the Student Transportation Operations Report. TEC defines that linear density of bus routes as the number of regular riders carried per mile of regular bus routes during the school year. TEA provides state funds for transportation based on the lesser of the actual cost per mile based on expenditures and total

mileage, or the maximum amount determined in one of the seven density groupings established by TEA. **Figure 5–3** shows the linear density groups and maximum allotment per mile used by TEA.

**FIGURE 5–3
TEXAS EDUCATION AGENCY LINEAR DENSITY GROUPS
SCHOOL YEAR 2016–17**

LINEAR DENSITY GROUPS	MAXIMUM ALLOTMENT PER MILE
2.400 and greater	\$1.43
1.650 to 2.399	\$1.25
1.150 to 1.649	\$1.11
0.900 to 1.149	\$0.97
0.650 to 0.899	\$0.88
0.400 to 0.649	\$0.79
0.000 to 0.399	\$0.68

SOURCE: Texas Education Agency, School Transportation Allotment Handbook, May 2014.

For school year 2016–17, Lockhart ISD’s cost per mile for regular program students was \$2.45 (**Figure 5–2**), and its linear density was 0.67. Based on the reported annual regular program mileage of 749,082 and the linear density allotment rate of \$0.88, the district received an allotment of \$659,192 for school year 2016–17.

ACCOMPLISHMENT

- ◆ Lockhart ISD implemented a two-tier transportation system to improve student transportation experiences by decreasing ride time.

FINDINGS

- ◆ Lockhart ISD lacks effective oversight of student transportation safety.
- ◆ Lockhart ISD lacks effective oversight of the operational performance of its transportation services.
- ◆ Lockhart ISD lacks sufficient long-term planning for transportation needs related to projected enrollment growth.
- ◆ Lockhart ISD does not effectively communicate with and involve transportation stakeholders.
- ◆ Lockhart ISD does not provide sufficient oversight of student behavior management.

RECOMMENDATIONS

- ◆ **Recommendation 12: Increase transportation safety oversight and develop and implement procedures for transportation and school bus safety.**
- ◆ **Recommendation 13: Amend the transportation management company contract and develop procedures to monitor the efficiency of transportation operations.**
- ◆ **Recommendation 14: Establish comprehensive planning procedures for replacing buses.**
- ◆ **Recommendation 15: Develop and implement systems to communicate with parents and solicit feedback from transportation service stakeholders.**
- ◆ **Recommendation 16: Develop and implement behavior management procedures for student transportation services.**

DETAILED ACCOMPLISHMENT

DECREASED RIDE TIME

Lockhart ISD implemented a two-tier transportation system to improve student transportation experiences by decreasing ride time.

Before school year 2016–17, Lockhart ISD transported students using a routing structure commonly referred to as a single-tier system. The system is facilitated by a similar bell-time structure across the educational programs. As a result of the single-tier system, kindergarten to grade 12 students are transported on the same route bus and are dropped off or picked up at each of the campuses on a sequential schedule. A single-tier system is common in rural areas that are geographically large with low-population densities.

In Lockhart ISD, some students experienced extremely long ride times as a result of the single-tier system. District staff also reported issues managing student behavior as a result of students of all ages riding the same buses.

Lockhart ISD staff researched options for decreasing ride time and implemented a two-tier system. The district leadership was aware that the change would increase mileage and costs, but it prioritized improved student transportation experiences through decreased ride time.

District and vendor staff, including bus drivers, reported a decrease in disciplinary issues as a result of using a two-tier

system and no longer having students of all ages riding the same buses.

DETAILED FINDINGS

SAFETY OVERSIGHT (REC. 12)

Lockhart ISD lacks effective oversight of student transportation safety.

The district’s transportation contract outlines responsibilities related to drug and alcohol screening for transportation staff. The district’s contract requires the vendor to develop a preemployment screening program for all candidates and to conduct testing, in accordance with federal regulations, of commercial motor vehicle operators for use of alcohol or a controlled substance that violates law or federal regulation.

According to federal regulations, employers must conduct random alcohol testing of 10.0 percent of driver positions and random controlled substances testing of 25.0 percent of driver positions. Dates for random tests should be scheduled reasonably throughout the calendar year. Employers also must test drivers for controlled substances and alcohol use following an accident.

Figure 5–4 shows the district’s random testing data for controlled substances and alcohol for calendar years 2015 to 2017. Figure 5–4 shows that the transportation management company failed to achieve the required minimum number of random alcohol and controlled substance tests for staff holding commercial driver’s licenses. In addition, it appears that transportation management company staff who were tested after a bus accident (post-accident testing) were not tested for both alcohol and controlled substances, as required by federal regulations. Furthermore, it appears that the

transportation management company failed to ensure that the dates for administering random alcohol and controlled substances tests were scheduled throughout calendar year 2017.

In addition to not ensuring that the transportation management company staff are properly tested for drugs and alcohol, the district also does not ensure that district staff who drive buses receive required screenings. Athletic coaching staff hold commercial driver’s licenses and drive activity buses for extracurricular activities or field trips. The district’s transportation contract assigns responsibility to the district for testing district staff that have commercial driver’s licenses. However, during an onsite visit, the Legislative Budget Board’s School Performance Review Team found no evidence that district staff who hold a commercial driver’s license and may drive activity buses are tested randomly for substances and alcohol.

The district lacks written procedures for transportation safety, resulting in unsafe operating practices. For example, the district has not provided clear written procedures to guide dispatchers in the event of a school bus accident. The district also lacks a written policy for bus drivers to follow if a driver is unable to drop off a student at the bus stop in the afternoon. This circumstance can occur for disciplinary reasons, or because the authorized receiver of a student is not present at the bus stop. When such a circumstance occurs, the transportation management company typically transports these students to the transportation facility to await the parent’s or authorized receiver’s pickup. This practice results in unnecessary safety and liability issues and causes buses to run late. The transportation facility is not a safe environment for students, and transportation staff may not be trained to

**FIGURE 5–4
LOCKHART ISD TRANSPORTATION DEPARTMENT RANDOM SUBSTANCE AND ALCOHOL TESTING DATA
CALENDAR YEARS 2015 TO 2017**

YEAR	MONTH(S)	RANDOM SUBSTANCE TESTING			RANDOM ALCOHOL TESTING		POST-ACCIDENT TESTING	
		ACTUAL NUMBER TESTED	ESTIMATED MINIMUM REQUIRED AT 25.0 PERCENT	ESTIMATED MINIMUM REQUIRED AT 50.0 PERCENT	ACTUAL NUMBER TESTED	ESTIMATED MINIMUM REQUIRED AT 10.0 PERCENT	ACTUAL NUMBER TESTED FOR SUBSTANCES	ACTUAL NUMBER TESTED FOR ALCOHOL
2015	February, April, May, September, November	37	N/A (1)	24	8	5	2	0
2016	March, September	10	12	N/A (1)	4	5	3	1
2017	March	10	13	N/A (1)	5	6	2	0

NOTE: Beginning in January 2016, the federal minimum requirement for random substance and alcohol testing was decreased from 50.0 percent to 25.0 percent of the eligible pool.

SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

supervise students or manage students displaying behavioral issues.

Figure 5–5 shows examples of unsafe transportation operating practices observed by the review team compared with school transportation best practices and statute.

In addition to the observed unsafe practices, onsite interviews indicated that the district does not require all students who may ride a school bus during the school year to participate in school bus emergency evacuation training. Although not required by the Texas Education Code, this training is an important industry safety practice.

The lack of district oversight of transportation safety and written procedures and expectations increases the risk that unsafe practices continue uncorrected, and that students and staff lack the information necessary to respond to emergency situations.

Effective districts provide active oversight of safety protocols for contracted transportation services and have consistent policies and procedures.

Lockhart ISD should increase transportation safety oversight and develop and implement procedures for transportation and school bus safety.

The district should ensure that the transportation management company provides ongoing training of drivers and students. The training should address bus loading, bus riding, bus unloading, procedures, and proper practices when checking the bus for students that may be sleeping or hiding. The district should hold transportation staff accountable to monitor bus inspections and student loading

and unloading, and should hold drivers and students accountable for adherence to safe riding practices and related statutes.

The district should consider requiring school bus evacuation and safety training for all Lockhart ISD students that ride or may ride a bus during the school year. The district should consider including any practice that promotes student safety in its emergency preparedness planning and training. The district should utilize all training resources made available by the federal government, state government, and school bus industry regarding the safe transportation of students, bus evacuation, and emergency response.

Lockhart ISD should convene a committee that includes representatives from operations, special education, the transportation management company, legal, and other departments as appropriate. The committee should draft procedures and actions to be taken in the event of a bus accident or incident (with or without students aboard) that results in an injury, damage to the bus, or damage to public or private property. This committee also should identify what steps to follow in the event that an authorized receiver, when required, is not at the bus stop to receive the student. The committee should contact other school districts to identify best practices in response to bus accidents, incidents, and lack of an authorized receiver at bus stops.

Lockhart ISD should mandate immediate compliance by the transportation management company to all regulations pertaining to controlled substance and alcohol testing of staff that hold a commercial driver’s license and drive district buses. The district should require the vendor to submit monthly compliance updates. In addition, the district should

**FIGURE 5–5
LOCKHART ISD TRANSPORTATION OPERATING PRACTICES OBSERVED DURING ONSITE REVIEW
NOVEMBER 2017**

OBSERVATIONS	SAFETY BEST PRACTICE
Multiple incidents where students on buses stood and walked toward the exit doors while the buses were in motion.	A school district may not require or authorize a child to stand on a school bus or passenger van that is in motion, pursuant to the Texas Education Code, §34.004.
In school bus loading zones, drivers left the engines running and students aboard the buses or doors open.	When the drivers are not on the buses, buses are turned off, keys are removed, all students disembark the buses, and the door is closed.
No observed supervision by transportation staff to ensure that drivers completed required bus safety inspections.	Regular oversight of bus safety inspections, including unscheduled monitoring visits.
Poor quality of lighting in the parking lot, and nonexistent lighting in most areas of the parking lot. This condition impairs proper pretrip bus inspections conducted by drivers, which increases the likelihood of accidents.	Well-lit parking lots that provide a safe environment for students.

SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

institute random alcohol and substance testing, as mandated, for all Lockhart ISD staff that hold a commercial driver's license who may transport students any time throughout the year. The superintendent should consider using Lockhart ISD human resources staff to monitor compliance.

The assistant superintendent of operations and technology should evaluate the adequacy of the outdoor lighting at the bus parking lot, and the feasibility of painting the bus stall lines with a fluorescent paint to enhance visibility when it is dark.

Since the time of the review, transportation vendor staff indicated that they conducted controlled substance testing for 12 staff, including testing five for alcohol in December 2017. In addition, transportation vendor staff indicated that the Lockhart ISD Maintenance and Operations Department addressed the lighting issues in the bus parking lot.

The district could implement this recommendation with existing resources.

OPERATIONAL PERFORMANCE OVERSIGHT (REC. 13)

Lockhart ISD lacks effective oversight of the operational performance of its transportation services.

During the onsite review, the transportation management company appeared to be working to deliver efficient transportation services for the district. However, the review team identified several opportunities for the district to strengthen operational oversight and controls of the contract management.

The district's transportation contract requires the vendor to submit to the district daily, monthly, and annual reports. The contract requires the vendor to prepare a daily report for the district about any accident. Monthly required reports include on-time arrival rates at a campus; average daily ride times; discipline referrals per campus and per driver for regular education and special education; bus utilization data; elementary school and secondary school riders per bus; vehicle operational rate; number of activity trips; and number of drivers available versus optimal. The contract indicates that monthly reports also may include fuel consumption, fuel costs, maintenance of the district's leased or owned equipment, and number of students transported per route. The required annual reports are for accidents of greater than \$1,000 in total damages per 100,000 miles; operating cost per mile and linear density, calculated annually from state reports; average cost per student transported for regular education and special education students; and average cost per bus for regular education and special education buses.

However, district staff were not aware of these deliverables, and the review team found no evidence that the district monitors that these reports are provided in accordance with the contract.

The review team found no evidence that the district uses performance objectives to measure against established targets and benchmarks, or that it uses key performance indicators to improve operations. A performance measurement system identifies a series of measurable goals and objectives. A desired goal or benchmark is established for each measurement based on industry standards and peer data. The department then documents its data and compares it to the benchmarks. Although some data is forwarded monthly to the assistant superintendent of operations and technology, the data lacks comparative reporting among months and years, and reports lack appropriate measurements tied to goals and data-driven decisions.

A major factor in operation performance is the condition of the transportation fleet. However, the review team found no evidence that the district exercised its right to inspect and validate the condition of district school buses. This contractual right authorizes Lockhart ISD to inspect buses at any time, with or without prior notice to the transportation management company.

In addition to the lack of performance objectives, the contract lacks consequences for failure to perform or failure to perform in a timely manner all requirements and incentives for exceptional performance. The contract also lacks language authorizing the district to review at any time current driving records, background checks, documentation of drug and alcohol testing compliance, annual physical examination compliance, and training verification of drivers transporting district students. The contract also lacks language approving or rejecting any and all bus monitors or aides, managers, dispatchers, mechanics, routers, supervisors, trainers, and other transportation management company staff at any time for the duration of the contract.

Additionally, the department has not developed a systematic process for how it tracks and reports transportation-related data to TEA. The assistant superintendent of operations and technology indicated that he had not been tasked officially with reporting transportation data to TEA, and he was not familiar with the required reports. TEA data is used to determine levels of state funding, and school districts that receive the funding maintain responsibility for the timely, accurate reporting of required state data.

According to onsite interviews, the CFO submitted information for the school year 2016–17 School Transportation Operations Report. Transportation management company staff worked with district administrative staff to submit information for the School Transportation Route Services Report. Various district and transportation management company staff performed reporting tasks, but staff indicated that expectations were inconsistent for who maintained and entered state transportation data.

Failure to accurately track and report performance metrics means that the Transportation Department may not be assessing its performance effectively nor establishing goals for improvement. Lockhart ISD’s lack of tracking performance measures makes it difficult to ensure that students are

transported safely and in the most efficient and effective means possible.

Incorporating performance metrics into transportation operations enables effective districts to see how well or how poorly their transportation operations function. Data from the performance metrics is used by effective districts to make data-driven decisions supported by objective evidence. **Figure 5–6** shows examples of transportation benchmarks used in other districts or noted in transportation research.

Lockhart ISD should amend the transportation management company contract and develop procedures to monitor the efficiency of transportation operations.

Before renewing the transportation contract for additional terms, Lockhart ISD should conduct, with appropriate district and legal staff, an in-depth review and analysis of the

**FIGURE 5–6
SCHOOL TRANSPORTATION INDUSTRY BENCHMARKS
OCTOBER 2017**

BENCHMARK	MEASURE
Preventable Accidents	1:100,000 miles
On-time Performance	99.5% (includes all services)
Routing Utilization Efficiency	80.0% of available time or available capacity
Runs Per Bus (AM)	2.3 to 2.5 (triple-tiered system)
	1.6 to 1.9 (double-tiered system)
Bus-to-Mechanic Ratio	25:1 to 30:1, depending on fleet type and age
Spare Bus Ratio	12.0% to 15.0% depending on fleet mix and trip volume
Driver Turnover Rate	< 15.0%
Parts Cost Per Mile (no labor)	\$0.16 to \$0.18, depending on fleet type and age
Maintenance Cost Per Mile (parts, supplies, and labor)	\$0.39 to \$0.43, depending on fleet type and age – assumes 13,000 miles per bus per year
Fleet Miles Per Gallon	6.0 to 7.0, depending on fleet mix, type, and age
Driver Labor Percentage of Operating Costs	39.0% to 43.0% (benefits and workers' compensation excluded)
Total Labor Percentage of Operating Costs	54.0% to 61.0% (benefits and workers' compensation excluded)
Insurance and Risk Percentage of Cost	5.0% to 10.0% (workers' compensation excluded)
Annual Cost Per Bus Operated	\$30,000 to \$50,000 per bus (no capital cost)
Special Education Services	
• Percentage of Pupils Transported	5.0% to 10.0%
• Percentage of Service Time	20.0% to 40.0%
• Percentage of Total System Costs	30.0% to 50.0%
Fleet Useful Life	10,000 miles to 15,000 miles per year, 180,000 miles maximum
	Regular-run vehicles – 10 years to 12 years; spares – 11 years to 13 years

SOURCES: Legislative Budget Board School Performance Review Team, October 2017; Council of the Great City Schools, 2010; American School and University Magazine, 2005; National Association of State Directors of Pupil Transportation, 2010.

existing contract with the transportation vendor. This process should involve the following actions:

- reviewing a variety of transportation-related contracts utilized in similar-sized or larger school districts across the U.S. for best practice contract language that can be incorporated into district transportation service contracts;
- identifying and strengthening existing contract language that is ambiguous or difficult to enforce, including definitive timelines and definitions;
- adding performance standards and consequences for failure to perform; and
- adding, as appropriate, financial incentive language for superior performance and service.

Lockhart ISD should develop and monitor performance indicators to measure service levels and goal achievement and consider incorporating these indicators into the contract. This task can be completed by developing training for key staff in the area of contract administration best practices. In addition to what is monitored currently, the district should require and monitor industry performance indicators, including but not limited to on-time performance percentage, miles between accidents, miles between breakdowns, percentage of bus fleet in service daily, seat utilization percentage, fuel cost as percentage of retail, turn time to place new students on the bus, and driver turnover rate percentage.

The assistant superintendent of operations and technology should ensure that vendor performance evaluations are written and issued regularly and are used as a factor in authorizing vendors to bid on or to be awarded contracts.

The district could implement this recommendation with existing resources.

ENROLLMENT GROWTH PLANNING (REC. 14)

Lockhart ISD lacks sufficient long-term planning for transportation needs related to projected enrollment growth.

Lockhart ISD is a fast-growth district with a large number of students that require transportation across a large geographical area. Lockhart ISD contracted with demographers to conduct ongoing, detailed projections of growth within the district during the next 10 years. However, the district did not effectively leverage the demographic growth study to inform long-term district plans for student transportation

services. The review team found no documentation projecting the number of students that will require transportation, or a projected number of or capacity of buses needed to provide the anticipated increase in service.

Lockhart ISD's bus inventory shows that, out of the 53 buses that Lockhart ISD owns, 44 of them are model year 2011. This type of distribution is not conducive to the development of a regular and sustainable replacement schedule. The number of model year 2011 buses will require the district to actively manage this portion of the fleet. This means replacing the units early or retaining them for a limited period beyond the desired retention cycle. By employing active management, the number of new buses that must be purchased annually can remain relatively stable, enabling the district to maintain a more predictable asset replacement schedule and establish a sustainable method of financing.

Fleet replacement procedures in the district lack structure, and the district has not established a formal fleet management-related policy or funding strategy. Lockhart ISD does not designate funding specifically for fleet replacement in a given year. Funding for new buses typically is considered annually rather than as part of a long-term replacement strategy.

District staff indicated that they are exploring options for bus replacement schedules and funding options. The assistant superintendent of operations and technology stated that he was in the process of developing replacement plans. These plans include a proposed schedule for four buses to be replaced during the first year, six during the second year, and six during the fourth year. District staff also stated that the largely uniform age of the fleet may make it necessary to replace a large number of buses in a single year. District leaders are considering multiple options for funding bus replacement, including a bond election, grants, maintenance tax notes, and budgeting.

However, Lockhart ISD staff did not provide any documentation of the informal plans, or a timeline for developing a formal replacement plan and securing funding. The review team found no evidence of analysis regarding future bus procurement options, including district ownership, lease, lease-purchase, vendor to provide buses, or combination thereof, or fuel type options, alternatives, or infrastructure needed.

Based on observations and enrollment projections, the transportation facility, located next to the Carver Early Education Center, is too small for the existing number of buses in operation. The facility does not provide safely for

fleet expansion that may be needed to accommodate increased student enrollment. In recognition of the shortage of space at the existing maintenance facility, district staff cleaned the maintenance facility with the goal of parking some spare buses there to increase available space at the transportation facility. District staff also indicated that the district is analyzing options for future construction of a replacement or satellite transportation facility on district-owned property.

Without effective plans for fleet replacement and dedicated funding, the district risks being unable to maintain a fleet sufficient to meet needs for student transportation services. Failure to stagger the replacement of buses has led to an aging fleet with a largely uniform age. The result could place an extreme financial burden on the district if it becomes necessary to replace large numbers of buses in a single year.

To assist school districts in the management of their fleets, the Texas Comptroller of Public Accounts published a best practice example for vehicle replacement planning. **Figure 5–7** shows the analytical and budgetary processes that effective districts use when developing replacement plans.

Industry guidelines provided in a 2002 position paper by the National Association of State Directors of Pupil Transportation (NASDPT) suggests guidelines of 12 years to 15 years for large buses and eight years to 10 years for smaller buses.

Lockhart ISD should establish comprehensive planning procedures for replacing buses.

The district should establish a formal replacement-planning procedure that dictates the time and mileage period when buses should be replaced. Starting with NASDPT guidelines, the district should establish replacement criteria of age and mileage for the school bus fleet. Annual expenditure requirements can be determined after the plan is developed and the most appropriate method of financing is determined.

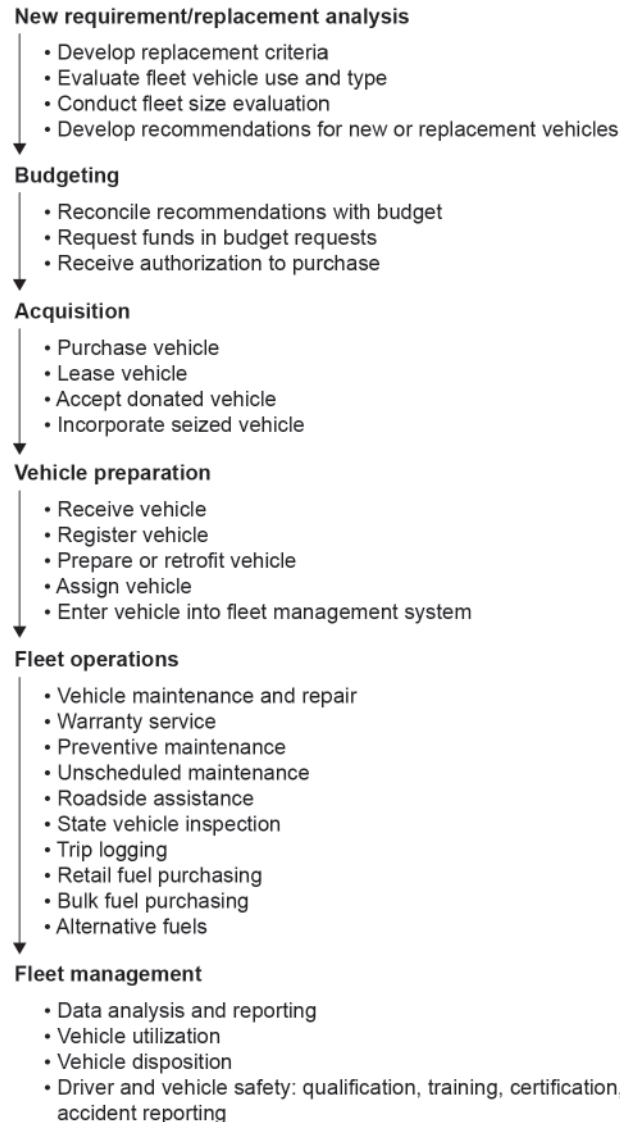
Lockhart ISD should consider revising demographic studies to incorporate projections for student transportation enrollment and geographic distribution.

The district could implement this recommendation with existing resources.

STAKEHOLDER INPUT AND COMMUNICATION (REC. 15)

Lockhart ISD does not effectively communicate with and involve transportation stakeholders.

**FIGURE 5–7
SAMPLE TEXAS STATE VEHICLE FLEET MANAGEMENT PLAN
FOR TEXAS PROCUREMENT AND SUPPLIER SERVICES
MARCH 2010**



SOURCE: Texas Comptroller of Public Accounts, March 2010.

Lockhart ISD enables the transportation vendor to have the primary role in communicating with stakeholders. Stakeholders include parents, representatives of the community, students, and school administration. The review team found no plan to conduct formal surveys to gauge transportation customers’ satisfaction with services provided or to identify areas of concern.

According to onsite interviews, parents are required to call or travel to the transportation fleet maintenance facility to

register their students and secure routing information before the start of each school year. This practice unnecessarily burdens parents when other notification options, such as districtwide notification systems, are available. This practice also causes parents and students to be in an area where buses are fueling, backing, maneuvering, and parking.

Effective districts elicit stakeholder input for transportation functions. This input includes contributions from those who drive the buses (bus drivers, teachers, coaches, etc.), those who ride the buses or who have a vested interest in who rides the buses (students, parents, etc.), and those who are responsible for each campus (campus administrators). In addition, effective school districts communicate with students and parents in a variety of ways, including through mail, e-mail, phone, text, and flyers sent home with students.

Lockhart ISD should develop and implement systems to communicate with parents and solicit feedback from transportation service stakeholders.

The district should develop programs to measure customer satisfaction, including the use of customer surveys, to identify service concerns and establish future priorities. At a minimum, the district should solicit input from parents, campus administrators, teachers on field trips, the athletic director, and coaches. The district can include evaluating transportation customer satisfaction as part of a districtwide effort to evaluate all functions, or make this evaluation a requirement in contracts with bus vendors.

Lockhart ISD should explore options for providing routing information to parents at the time the student is registered at the campus. These options would eliminate the need for parents to register and secure routing information for their students at the transportation facility. The district and vendor should coordinate which available notification systems can be used to determine the most effective way to communicate with families. Parents and, if applicable, their students can sign receipt of bus rule documentation at the time of registration.

The assistant superintendent of operations and technology should consider using a districtwide notification system to contact parents with routing information, mailing computer-generated letters with routing information, or both methods, several days before the start of school. The district should include a telephone number parents can call if they have questions.

The district could implement this recommendation with existing resources.

STUDENT BEHAVIOR MANAGEMENT (REC. 16)

Lockhart ISD does not provide sufficient oversight of student behavior management.

Lockhart ISD Board Policy FOA (LEGAL), in accordance with the Texas Education Code, Section 37.0022, addresses student discipline and removal of students by school bus drivers. The policy states that “the driver of a school bus transporting students to or from school or a school-sponsored or school-related activity may send a student to the principal’s office to maintain effective discipline on the school bus. The principal shall respond by employing appropriate discipline management techniques consistent with the Student Code of Conduct.”

The Lockhart ISD Student Code of Conduct also references removal from the school bus, stating the following:

A bus driver may refer a student to the campus behavior coordinator’s office to maintain effective discipline on the bus. The campus behavior coordinator must employ additional discipline management techniques, as appropriate, which can include restricting or revoking a student’s bus riding privileges.

Since the district’s primary responsibility in transporting students in district vehicles is to do so as safely as possible, the operator of the vehicle must focus on driving and not have his or her attention distracted by student misbehavior. Therefore, when appropriate disciplinary management techniques fail to improve student behavior or when specific misconduct warrants immediate removal, the campus behavior coordinator may restrict or revoke a student’s transportation privileges, in accordance with law.

The district’s contract with the vendor states that Student Transportation Specialists and the district “shall jointly develop a disciplinary policy to provide guidance to drivers.” However, the district has not established a local board policy FOA, nor has it jointly developed with the vendor the discipline policy required by its contract.

The district’s buses are equipped with four digital surveillance cameras, one positioned forward, one on the driver, one aimed toward the rear of the vehicle, and one in the middle. Cameras begin recording when the engine starts, and continue recording until 10 minutes after the engine stops. Footage is kept for two weeks before it is replaced with new

recordings. The footage is time-stamped, and the system includes a panic button that, when pressed by the driver, notes the time in the tape.

The transportation management company employs a discipline coordinator, who has been in the position since school year 2016–17. The vendor hired the discipline coordinator in part to fill a need for bilingual communication with students' parents.

When behavioral issues arise on district buses, bus drivers typically provide a discipline report to the dispatcher. The dispatcher confirms the information and gives the report to the discipline coordinator. The discipline coordinator researches the student's number of preexisting referrals, reviews digital surveillance records, and shares every report and relevant camera footage with the student's campus principal using a shared drive accessible by district and vendor staff. The discipline coordinator contacts the student's parents to discuss the incident and mails the report to the general manager and the assistant superintendent of operations and technology. If the discipline coordinator cannot reach a parent by telephone, he leaves a message and sends a report. He indicated that he also conducts follow-up calls and makes home visits as needed, according to his best judgement. The discipline coordinator enforces a procedure that the vendor suspends students from the bus after seven total referrals in a year.

District and vendor staff stated that behavior referrals to campus administrators often are delayed due to review and logging by vendor staff, and that camera data made available to campuses frequently is delayed. Vendor staff indicated that the response from campus administrators to discipline referrals is inconsistent, with varying levels of involvement with follow-up consequences on campuses.

When a driver deems a student's behavior to be an immediate safety issue, the driver can return to the transportation facility with the student. However, vendor staff indicated that they have limited staff available, and that they are not trained to work with students and behavior management. The district does not provide clear guidance about how to manage student safety during behavioral escalations, including procedures for contacting the campus or relevant local authorities if parents do not pick up students in a timely manner. The district's contract with the vendor does not clearly address steps to follow in these situations, and the district's inconsistent campus-level responses may not align with the description within the Student Code of Conduct.

Staff offered inconsistent interpretations of who had the authority to remove students from the bus, whether it is only the driver, only the principal, or only the vendor.

Lack of behavior management procedures for student riders presents potential safety and liability issues for the district. Without strong behavior management practices, drivers could have a higher risk of being distracted by student behavior. When students are returned to the transportation facility after serious incidents, the vendor lacks dedicated, trained staff to provide supervision, which places students, property, vendor staff, and the district at risk.

Effective districts that contract their transportation operations work with the vendors to ensure consistent processes related to student behavior on buses.

Lockhart ISD should develop and implement behavior management procedures for student transportation services.

Lockhart ISD's assistant superintendent of operations and technology should develop a collaborative plan with campus administrators, transportation management company staff, and others as appropriate, regarding the correct and timely response to student discipline issues that occur on the bus and in loading zones.

For this plan to be effective, the district must establish accountability for administrators, drivers, and students. The plan must include reasonable, progressive discipline steps and should require the consistent and timely handling, tracking, and monitoring of all student discipline referrals. The plan also must require continuing training for all students, drivers, and affected staff regarding district bus policies.

Lockhart ISD should identify processes needed to expedite the uploading of video camera data for campus administrators to quickly review and take prompt action as needed. The district should evaluate costs to upgrade outdated recording hardware and to increase camera coverage versus waiting until the bus fleet is replaced.

Lockhart ISD should establish a methodology to track all referrals throughout the process, to identify and address trends, and to develop training.

Since the time of the review, transportation vendor staff indicated that they worked with the Lockhart ISD discipline specialist to revise the transportation discipline structure and implement a standardized, three-tiered discipline matrix. Vendor staff indicated that the district discipline specialist

provided training for bus drivers and is expected to provide additional training throughout the year.

The district could implement this recommendation with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 5. TRANSPORTATION							
12. Increase transportation safety oversight and develop and implement procedures for transportation and school bus safety.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13. Amend the transportation management company contract and develop procedures to monitor the efficiency of transportation operations.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14. Establish comprehensive planning procedures for replacing buses.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15. Develop and implement systems to communicate with parents and solicit feedback from transportation service stakeholders.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16. Develop and implement behavior management procedures for student transportation services.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 6. FACILITIES MANAGEMENT

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

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

Figure 6–1 shows Lockhart Independent School District's (ISD) instructional facilities. The district's facilities include one early education center, five elementary campuses, one junior high campus, one high school campus, an alternative high school campus, and a disciplinary alternative education center. In May 2014, Lockhart ISD passed a bond for new additions and renovations to district facilities. The district's newest facility, Alma Brewer Strawn Elementary School, opened in school year 2016–17. Lockhart ISD's grade nine campus, M.L. Cisneros Freshmen Campus, closed after school year 2016–17, and students relocated to the high school campus. The Legislative Budget Board's School Performance Review Team visited the district in November 2017. At the time of the team's onsite review, the district planned to sell some administrative buildings and relocate dispersed administrative offices to a centralized location at the former M.L. Cisneros Campus. Pride High School, the alternative high school campus, which is housed in an old armory building that does not have a cafeteria, also will relocate to the former M.L. Cisneros Freshmen Campus.

Other district facilities include the special education building, transportation facility, technology building, community education building, the Maintenance and Operations Department building, the central administration building, athletic fields, field houses, press boxes, and storage sheds.

FIGURE 6–1
LOCKHART ISD INSTRUCTIONAL FACILITIES
SCHOOL YEAR 2017–18

FACILITY	YEAR BUILT	SQUARE FOOTAGE
Lockhart High School	1965	194,782
Lockhart Junior High School	2001	152,063
Lockhart Discipline Management Center	2000	7,162
Pride High School	1952	11,344
Alma Brewer Strawn Elementary School	2016	77,537
Bluebonnet Elementary School	2005	81,787
Carver Early Education Center	2000	49,527
Clear Fork Elementary School	1970	65,548
Navarro Elementary School	1980	57,661
Plum Creek Elementary School	1987	49,044

SOURCES: Caldwell County Appraisal District Property Search Results for Lockhart ISD for Year 2018; American Appraisal Summary Appraisal Report for Property Insurance Purposes As of February 4, 2013.

Lockhart ISD's assistant superintendent of operations and technology oversees the Operations and Technology Division, which includes the Food Services, Transportation, Maintenance and Operations, and Technology Departments. The director of maintenance manages the Maintenance and Operations Department and reports to the assistant superintendent of operations and technology. The director of maintenance supervises a maintenance staff of 17, including an administrative assistant. The maintenance staff have specialized training and include heating, ventilation, and air conditioning (HVAC) technicians; lock technicians; plumbers; carpenters; groundskeepers; electricians; and a painter.

For custodial services, Lockhart ISD staff clean the district’s instructional campuses and administrative facilities. The director of maintenance supervises 48 full-time-equivalent custodial positions, including head custodians. **Figure 6–2** shows the organization of the Lockhart ISD Maintenance and Operations Department.

The district performs most maintenance work internally. Lockhart ISD contracts for major repairs to large equipment and contracts with local pesticide and fire-safety inspection companies. **Figure 6–3** shows Lockhart ISD’s maintenance and operations budget for school year 2016–17 compared to peer districts. Peer districts are school districts similar to Lockhart ISD used for comparison purposes. Lockhart ISD’s maintenance and operations costs are \$804 per student, \$57

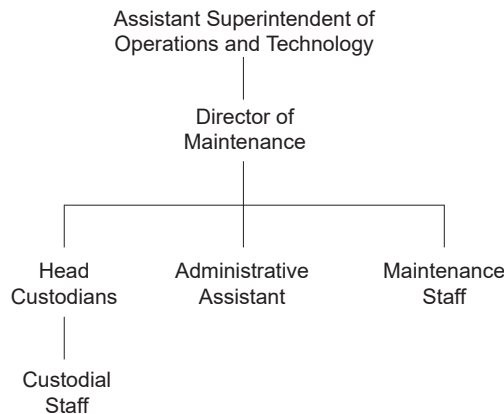
less than the peer district average of \$861 per student. Lockhart ISD’s total expenses are slightly greater than the peer district average, but the percentage of total budget expended on maintenance and operations costs is less than the peer district average.

Lockhart ISD uses a cooperative to purchase maintenance and custodial supplies. District staff indicated plans to construct a maintenance warehouse for bulk supplies after Pride High School moves to the former M.L. Cisneros Freshmen Campus, enabling the current maintenance space behind the campus to expand.

The district outsources major construction projects in accordance with Business and Finance Department procedures. Lockhart ISD does not maintain dedicated in-house staff to manage major new construction, addition, or renovation projects.

Lockhart ISD uses an online work-order management system to manage the processing of work orders in the district. Individual users, typically campus secretaries, initiate work orders. The director of maintenance assigns incoming tasks to individual staff by trade. The district provides maintenance staff with handheld devices to receive assignments and interact with remote systems while in the field. The work-order management system notifies the request initiator through email when the repair is complete.

**FIGURE 6–2
LOCKHART ISD MAINTENANCE AND OPERATIONS DEPARTMENT
SCHOOL YEAR 2017–18**



SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

ACCOMPLISHMENT

- ◆ Lockhart ISD assembled a diverse bond task force to advise the district and promote community support for a bond election.

**FIGURE 6–3
LOCKHART ISD AND PEER DISTRICT MAINTENANCE AND OPERATIONS COSTS
SCHOOL YEAR 2016–17**

DISTRICT	ALL FUNDS	PLANT MAINTENANCE/ OPERATIONS	PERCENTAGE OF ALL FUNDS	ENROLLMENT	COST PER STUDENT
Alice ISD	\$48,643,730	\$4,942,899	11.7%	5,111	\$967
Greenville ISD	\$57,749,361	\$4,481,203	8.7%	5,354	\$837
Mount Pleasant CISD	\$54,351,051	\$4,130,096	8.5%	5,312	\$778
Peer Average	\$53,581,381	\$4,518,066	9.6%	5,259	\$861
Lockhart ISD	\$58,434,345	\$4,550,139	9.2%	5,661	\$804
Over/Under: Lockhart ISD vs. Peer Average	\$4,852,964	\$32,073	(0.4%)	402	(\$57)

SOURCES: Legislative Budget Board School Performance Review Team, April 2018; Texas Education Agency, Public Education Information Management System, school year 2016–17.

FINDINGS

- ◆ Lockhart ISD lacks documented procedures to guide facilities-related functions.
- ◆ Lockhart ISD lacks processes for ongoing long-term facilities planning.
- ◆ Lockhart ISD has not evaluated the equity and efficacy of custodial staffing and services.

RECOMMENDATIONS

- ◆ **Recommendation 17: Develop a comprehensive procedures manual to address key responsibilities and functions related to facilities management, use, and maintenance.**
- ◆ **Recommendation 18: Establish district goals, expectations, and timelines for facilities planning.**
- ◆ **Recommendation 19: Adopt a comprehensive custodial staffing model, procedures, cleanliness standards, and a system for soliciting stakeholder feedback.**

DETAILED ACCOMPLISHMENT

BOND TASK FORCE

Lockhart ISD assembled a diverse bond task force to advise the district and promote community support for a bond election.

In preparation for a bond election during school year 2013–14, district leadership wanted a task force that best represented the community. Staff made efforts to include participants who represented diversity in location of residences, ethnicity, language, and campuses of attendance. Participants included community residents who had lived in Lockhart throughout their lives, residents with no students enrolled in the district, residents involved in the community, parents, recent graduates, and local leaders in business and government.

The 2014 bond task force provided input to district leaders through planning meetings regarding facility needs and recommended projects to be completed with bond funds. The district structured the bond task force to function independently from the Board of Trustees, and the task force did not interact with the board until the task force presented its recommendations. As a result of this process, the district raised sufficient community support to successfully pass a bond package to improve facilities across the district.

DETAILED FINDINGS

PROCEDURES (REC. 17)

Lockhart ISD lacks documented procedures to guide facilities-related functions.

In July 2017, the district developed an assistant superintendent of operations and technology position to oversee the Maintenance and Operations Department. The district also filled the vacant director of maintenance position. During school year 2016–17, a veteran craftsman served as interim director while the position remained vacant. At the time of the review, the assistant superintendent of operations and technology was in his first year in the position, and the director of maintenance had been in his position for less than a month.

Before these staffing changes, the district had not developed written procedures for many facilities-related responsibilities. As a result, the Maintenance and Operations Department retained limited institutional knowledge after turnover in department and district leadership.

For example, the district's documentation of procedures and expectations for preventive maintenance are outdated and incomplete. The district staff use a digital work-order system to automate some recurring tasks and preventive maintenance. This maintenance may include changing HVAC filters, inspecting playgrounds and elevators, pest control, maintenance of surfaces, and special equipment servicing. However, staff indicated that the district lacks comprehensive, documented schedules and expectations for preventive maintenance of all district equipment. District staff indicated that they had not evaluated the preventive maintenance schedule to ensure alignment with timelines established by warranties. Without schedules for all equipment, the district risks increased costs from replacing equipment that could achieve longer life through regular preventive maintenance. The district also risks voiding warranties through failure to complete mandated maintenance.

In another example, the department has a custodial handbook that contains detailed instructions for every 15-minute to 30-minute block of time for each campus. However, the handbook does not contain instructions for the alternative high school campus nor for administrative buildings cleaned by district custodians. The handbook also had not been updated to exclude the former M.L. Cisneros Freshman Campus, which closed at the end of school year 2016–17.

The Maintenance and Operations Department has not developed districtwide procedures for energy management to guide the use of district resources. The director of maintenance has experience developing energy procedures, and indicated a plan for implementing them at Lockhart ISD. However, the district did not have energy conservation plans in place at campuses and noninstructional facilities. The review team observed staff using electric items that are not provided by the district, such as personal refrigerators and lamps. District staff provided energy-use reports with short-term and long-term comparisons, but district procedures do not formally establish the types or frequency of reports expected by facilities staff. The board has not established a formal energy policy to guide the development of comprehensive energy conservation procedures.

District staff provided the review team with facilities inventories included in appraisal reports from the district's insurance provider. However, the appraisal report summary was completed during school year 2012–13. Since the time of the appraisal, the district completed extensive renovations to existing buildings and built new buildings, including a new elementary school. The district did not provide the review team with comprehensive, updated facilities documentation that includes these improvements and new construction.

According to onsite interviews, the new director of maintenance was researching, revising, and documenting current operating procedures in the district. The director of maintenance indicated plans to develop comprehensive procedures for custodial staff, facility usage, maintenance operations, end-user request procedures, and other general guidelines. However, these procedures were not in place at the time of the onsite review.

In the absence of written procedures, facilities staff conduct job responsibilities based on the historical knowledge of veteran staff, preexisting knowledge of industry standards and best practices, or through direct assignments from supervisors. The absence of documented procedures increases the risk that staff may perform functions in an inconsistent and inefficient manner. Each staff may approach a similar situation differently, which could result in inconsistencies and reduce effectiveness and efficiency.

A lack of written procedures risks potential gaps in controls, misunderstanding of roles and responsibilities, and inconsistent practices. Relying on institutional knowledge does not provide assurance that the district will continue to

operate effectively in the event of attrition or turnover among staff.

Effective districts use documented policies and procedures to provide strong guidelines for maintenance, custodial, and administrative staff to better meet the needs of facility end users and streamline processes.

Effective districts maintain procedures manuals that establish clear expectations, including the following elements:

- staff responsibilities, approval authority, and reporting requirements;
- annual training requirements and guidelines;
- management of work orders, for maintenance staff and end users;
- a process to maintain inventories of facilities and equipment;
- a process to develop a preventive maintenance plan;
- a process to develop budgets for projects, maintenance, and custodial needs;
- a process for end-user input and requests regarding facility needs and wants;
- a process to develop a preventive plan;
- procurement and contract management;
- change order management; and
- a process to request supplies, materials, and equipment, for maintenance and custodial staff.

Lockhart ISD should develop a comprehensive procedures manual to address key responsibilities and functions related to facilities management, use, and maintenance. The director of maintenance should distribute these procedures to the appropriate functional groups, such as purchasing and financial staff, to ensure completeness and accuracy with regard to practices and application.

The superintendent should provide a draft of the manual to the board for review before the manual is finalized.

The Maintenance and Operations Department can use the manual as a training guide and a component of the performance evaluation process to ensure that district practices align with the manual requirements. This alignment also helps to make compliance with procedures a measurable goal for all relevant district staff.

Since the time of the review, district staff indicated that the Maintenance and Operations Department developed drafts of an energy management policy and an energy management master plan for the board and the superintendent to review.

The district could implement this recommendation with existing resources.

FACILITIES PLANNING (REC. 18)

Lockhart ISD lacks processes for ongoing long-term facilities planning.

During school year 2013–14, the district developed a facilities master plan with the assistance of outside consultants in preparation for a bond election. Considering the district's fast growth, Lockhart ISD staff also hired an outside demographer to project growth across time. The district continues to receive demographic updates. Master plan components included a description of the process to implement a site-based and community-based approach; facility profiles; demographics; capacity analysis; budgets, priorities, and recommendations; and community survey results.

With the efforts of the bond task force, Lockhart ISD passed a \$63.9 million bond in May 2014. Projects approved for the bond included additions and renovations to Lockhart High School, construction of a new elementary campus, and districtwide capital improvements, including installation of air conditioning in gymnasiums, modifications to kitchen serving lines, restroom remodels, and entrance security.

Although the school year 2013–14 master planning process was comprehensive, the district has not updated the master plan since developing that plan. Interviews with district staff indicated that the master planning process is not formalized, and internal inconsistency exists regarding the current status of long-term facilities planning in the district. For example, board members and district staff indicated that the district did not have a facilities master plan; however, the superintendent indicated plans to use the demographic update report to revise the long-term facility master plan by the end of school year 2017–18. The district also submitted to the review team incomplete facilities planning documentation with projected costs for roofing, HVAC, and blank pages for flooring projections. District staff provided a property appraisal document from the insurance company as the facilities needs assessment; however, this document does not contain detailed assessments of facilities conditions, space utilization and capacity data, or deferred maintenance

needs and costs. District staff indicated that the district has not developed a long-term deferred maintenance plan. The superintendent tasked the assistant superintendent of operations and technology and the director of maintenance to develop a deferred maintenance plan; however, at the time of the review, no documentation existed of current and future maintenance needs of the district.

District staff indicated that they were in the process of developing baseline facilities information and planned to conduct assessments every two to three years; however, the review team did not observe documentation for any of the plans referenced by district staff.

Without formalized facilities planning processes, the district does not maintain updated information regarding current facilities needs in its planning documents. Current needs in the district that are not identified in planning documents include fencing at the junior high school campus, fire-safety panel updates, and possible fire-safety retrofitting for older buildings. Due to attrition and turnover in key facilities management positions, district staff could not provide clear information about the status of fire-safety systems within each campus. The need to update the facilities master plan is especially urgent due to the district's fast growth rate. The district soon will need to consider additional construction as elementary campuses quickly approach capacity. Enrollment is growing each year, and, at the time of the review, the newest elementary campus, Alma Brewer Strawn, was nearing capacity within its second year of operation.

The lack of an updated facilities master plan also reduces transparency for the district's process of prioritizing capital improvements. The annual decision-making process for capital expenses is not based on data and financial projections driven by an updated master plan. The superintendent indicated that the district's practice was to allocate \$250,000 per year from the general fund for capital expenses. Based on interviews conducted with various campus and district staff, the planning and prioritization process for projects that were not addressed by the bond master plan has been unclear. Little transparency exists with regard to how teacher and principal requests become approved projects and receive budget allocations. Campus administrators indicated that they received a capital overlay spreadsheet with their budgets to rank additional capital improvements desired at each campus. District and campus staff described the prioritization system as problematic due to a lack of clear instructions regarding criteria for determining ranks and lack of communication about the decision-making process. Lockhart

ISD staff indicated requesting the same capital improvement projects for multiple years. The district did not communicate further after submission of the spreadsheet, and staff knew whether a project had been approved only when work began. District leadership expressed a plan to replace this system with district-level facilities decisions based on needs assessments, instead of relying on campus administrators to advocate for facility needs. The district’s current master planning process may provide insufficient data for district prioritization of and transparency related to campus-level facility needs.

The district lacks procedures to solicit stakeholder input into facilities planning decisions. Staff indicated that little input is received from parents and the community, but stakeholders would like to have a process for input. Aside from participation on the bond task force, representatives of the community and parents have limited means of affecting how projects are determined and prioritized. **Figure 6–4** shows that, among parents who participated in the review team’s survey (357 total), 24.4 percent felt that parents, community residents, students, faculty, staff, and the board were unable to provide input effectively into the facility-planning process.

Without an updated master plan, it is difficult to understand fully the needs at each campus and how effectively to prioritize those needs to better align with the budget available. The district risks not completing critical projects due to a lack of understanding regarding facility condition and available funding at the time it is necessary. The district cannot ensure the continuity of plans in case of attrition or turnover, and the district may be unable to optimize learning and safety in facilities without ongoing condition assessments. Considering the fast growth of Lockhart ISD, the district may need future bonds for new facilities; however, without a robust facility master-planning process, the district may experience difficulty passing bonds when needed.

Effective districts have policies to set expectations for the facility master-planning process. Effective districts conduct

annual assessments of facilities conditions and regularly update master plans. Typically, master plans require a complete update every five years to ensure that districts complete regular needs assessments and prioritize projects appropriately.

Lockhart ISD should establish district goals, expectations, and timelines for facilities planning. The director of maintenance and the assistant superintendent of operations and technology should coordinate to ensure that an assessment of facility needs is conducted for each instructional, noninstructional, and auxiliary facility in the district within a reasonable amount of time.

District staff should define and communicate applicable criteria to prioritize projects. Some subjectivity will be expected; however, the director of maintenance should establish a baseline so that campus administrators, teachers, students, faculty, and the community have an understanding of how needs will be addressed.

The district should consider ways to solicit feedback regarding facilities from key stakeholders. These methods may include the director of maintenance establishing a committee, conducting periodic meetings for feedback, adding an area to the website where stakeholders can submit their requests to the district, or something similar.

Using a similar process to the one conducted by the district during school year 2013–14, district staff should develop an updated master plan to include the status of each facility and the projects that will be completed or considered based on the established criteria. This plan would include:

- prioritization of projects and objectives based on facility safety, longevity, and educational requirements;
- support for estimates used for establishing master plan budgets;

FIGURE 6–4
LOCKHART ISD FACILITIES SURVEY RESULTS
NOVEMBER 2017

SURVEY QUESTION	GROUP	RESPONDENTS	STRONGLY AGREE		STRONGLY DISAGREE	
			OR AGREE	NO OPINION	OR DISAGREE	
The district effectively solicits input from various stakeholder groups (e.g., parents, community residents, students, faculty, staff, and the board) when facility planning.	District Staff	31	74.2%	22.6%		3.2%
	Campus Staff	227	45.8%	34.8%		19.4%
	Parents	357	38.7%	37.0%		24.4%

NOTE: Percentages may not sum to 100.0 percent due to rounding.
SOURCE: Legislative Budget Board School Performance Review Team, November 2017.

- input provided by district staff, students, community members, and other stakeholders; and
- details of approvals for projects and budgets.

The district could implement this recommendation with existing resources.

STAFFING (REC. 19)

Lockhart ISD has not evaluated the equity and efficacy of custodial staffing and services.

For school year 2017–18, Lockhart ISD had 48 custodial staff. Head custodians oversee custodial staff at the elementary schools, the junior high school, and the high school. Head custodians do not supervise the custodians that clean the alternative high school, disciplinary campus, and administrative buildings. The director of maintenance supervises all head custodians and custodial staff. At the time of the review, the director of maintenance had been in the position less than a month. During school year 2016–17, the director of maintenance position was vacated, and a veteran craftsman served as an interim director. During that time, the district staffed with a custodial supervisor. The district eliminated the custodial supervisor position for school year 2017–18.

Interviews with campus and district staff indicated that many stakeholders believe that custodial staffing is insufficient. District staff indicated that the district continues to grow in numbers of buildings and students; however, the number of custodial and maintenance staff is relatively constant. Campus and district staff stated that the custodial staff works diligently, but it is difficult to maintain high-quality custodial services with the staff size.

District administrators indicated that they are evaluating the best formulas and structure for custodial and maintenance staff, but the district does not have a board policy or administrative procedures establishing staffing expectations for the district.

Figure 6–5 shows custodian assignment data for school year 2016–17. The district did not provide custodial data for the alternative high school campus, disciplinary campus, or administrative buildings.

Industry standards establish an expectation that custodians can clean 18,000 to 31,000 square feet per eight-hour shift. **Figure 6–5** shows that each of Lockhart ISD’s custodians have square footage assignments at or below industry

standard, which indicates that the district has a sufficient number of custodial staff to clean district facilities.

Although Lockhart ISD’s custodial staffing levels support low square footage assignments per custodian, opportunities exist to enhance the efficiency and effectiveness of custodial services. **Figure 6–5** shows that space assignments for each custodian vary from approximately 12,000 square feet to more than 20,000 square feet per custodian. Typically, it is assumed that newer buildings are easier to clean, because they will have newer finishes. However, the Lockhart ISD custodial staffing pattern does not appear to consider such additional factors; all elementary campuses had four custodians assigned for school year 2016–17, regardless of age, condition, or size of facility or student population size.

In addition to inequity in staffing assignments, custodial staff indicated that they often perform duties outside of their daily required cleaning tasks when required by campus administrators. These duties could include setting up furniture for campus events, such as awards ceremonies. District custodians indicated that these ad hoc responsibilities make it difficult to perform regular custodial services.

The district’s allocation of resources among facilities staff lacks consistency. Some campus custodial staff indicated that their equipment is insufficient or poorly functioning. For example, some campuses lack moveable caution signs, and some have trash carts that are in disrepair. Some custodians reported difficulty communicating within large campuses, because they are not provided with district communication devices and their personal mobile phones receive intermittent service.

Lockhart ISD staff provided inconsistent responses about written custodial procedures, and the review team did not receive documentation that updated, consistent custodial procedures were in place for all staff. The district does not have adopted cleanliness standards used for setting expectations and evaluating effectiveness of custodial services.

The district does not have a process to solicit input and feedback from stakeholders about custodial services. District custodians are not always involved in decision making, campus administrators do not evaluate custodial services regularly, and community representatives do not provide feedback regularly.

Custodial staff reported insufficient substitutes. At the time of the review, staff indicated one substitute custodian was available, and that she was available primarily for elementary

**FIGURE 6–5
LOCKHART ISD CUSTODIAL ASSIGNMENTS
SCHOOL YEAR 2016–17**

CAMPUS	SQUARE FOOTAGE	CUSTODIANS PER CAMPUS	SQUARE FOOTAGE PER CUSTODIAN
Carver Early Education Center	49,527	3	16,509
Alma Brewer Strawn Elementary School	77,537	4	19,459
Clear Fork Elementary School	65,548	4	16,387
Plum Creek Elementary School	49,044	4	12,261
Navarro Elementary School	57,661	4	14,415
Bluebonnet Elementary School	81,787	4	20,448
Lockhart Junior High School	152,063	9	15,118
Lockhart High School	194,782	10	19,478

NOTE: Data provided by the district shows 42 custodial staff for school year 2016–17; the district’s website shows 48 staff for school year 2017–18.

SOURCES: Lockhart ISD, May 2017; Caldwell County Appraisal District property search results for Lockhart ISD for 2018; American Appraisal Summary appraisal report for property insurance as of February 4, 2013.

campuses. Custodians, especially head custodians, reported needing to work overtime hours to cover additional responsibilities or absent staff. District staff indicated that filling custodial positions and securing substitutes is very difficult. Based on interviews with custodial staff, significant overtime has been required to complete the duties at each school site without sacrificing quality of work. Custodial staff reported that they sometimes are encouraged to not utilize their compensatory time or vacation time due to the difficulty of finding substitutes.

According to onsite interviews, the district has opportunities to improve the efficiency of scheduling new custodians. The current hiring practice has been to hire custodians for a 10-month period. This practice eliminates the summer period from many of the newly hired custodial staff’s schedules, when needs are the highest to prepare for the new school year. Additionally, the head custodians are knowledgeable about where the greatest custodial needs are; however, they do not have input in scheduling new custodial staff.

The district’s lack of effective custodial staffing could result in staff turnover as a result of being overworked or lack of job satisfaction. Inadequate equipment could lead to inefficient utilization of time, and work quality may suffer.

Irving ISD employs several best practices that improve quality and responsiveness. The operations manager chairs the Operations Communications Council, which meets monthly and provides a forum for the staff to share concerns, complaints, and recommendations. Through this process,

Irving ISD ensures a high level of centralized oversight and sufficient direct feedback to promote effective ongoing performance. As a result, the district displays especially high satisfaction results from staff and the community.

The educational facilities organization APPA: Leadership in Educational Facilities provides best practices for facilities management. This organization publishes the Custodial Staffing Guidelines for Educational Facilities, which provides a survey and self-analysis tool to organize and describe current operations, identify needs for additional funding, or improve services. This publication includes a concept called five levels of cleanliness, which details a simple approach to assessing building cleanliness. **Figure 6–6** shows the key indicators for each of APPA’s five levels of cleanliness.

Lockhart ISD should adopt a comprehensive custodial staffing model, procedures, cleanliness standards, and a system for soliciting stakeholder feedback.

Lockhart ISD should establish a benchmarking tool rather than analyzing square footage per custodian to determine the number of staff needed. Other factors to consider are staff responsibilities within the facility, staff responsibilities for auxiliary spaces, adequacy of supplies and equipment, and facility age and condition.

The director of maintenance should develop a staffing matrix to assess the following factors: (1) current staffing, including the number of staff and qualifications; (2) the number of current and planned projects; and (3) funding sources to meet current custodial needs. The staffing matrix should consider the daily needs of each campus and auxiliary

buildings and should be organized in a way that will align annual budgets for staffing with the primary functions of each position.

The director of human resources, chief financial officer, and director of maintenance should consider the fiscal impact of budgeting for the requisite number of custodial staff in future fiscal years. To determine this impact, the district should

consider factors such as where staffing shortages may exist, custodial needs based on the condition and age of each facility, types of facilities and required upkeep, and resources required at auxiliary and administrative facilities.

The district should consider surveys or some other type of reporting system to assess the quality of work and timeliness to solicit real-time feedback. This system also would enable

FIGURE 6-6
APPA CLEANLINESS STANDARDS FOR EDUCATIONAL FACILITIES
NOVEMBER 2016

LEVEL	INDICATORS
Level 1 – Orderly Spotlessness	<ul style="list-style-type: none"> • Floors and base molding shine and are bright and clean; colors are fresh; • no buildup in corners or along walls; • all vertical and horizontal surfaces have a freshly cleaned or polished appearance and have no accumulation of dust, dirt, marks, streaks, smudges, or fingerprints; • lights all work, and fixtures are clean; • washroom and shower fixtures and tile gleam and are free of odor; supplies are adequate; and • trash containers and pencil sharpeners hold only daily waste and are clean and free of odor.
Level 2 – Ordinary Tidiness	<p>Same as Level 1 with the following exceptions:</p> <ul style="list-style-type: none"> • no more than two days' worth of dust, dirt, stains, or streaks on floors and base molding; and • dust, smudges, and fingerprints are noticeable on vertical and horizontal surfaces.
Level 3 – Casual Inattention	<ul style="list-style-type: none"> • Floors are swept or vacuumed clean, but may have stains upon close observation; a buildup of dirt or floor finish in corners and along walls can be seen; • dull spots or matted carpet in walking lanes; streaks or splashes on base molding; • all vertical and horizontal surfaces have obvious dust, dirt, marks, smudges, and fingerprints; • lamps all work, and fixtures are clean; and • trash containers and pencil sharpeners hold only daily waste and are clean and free of odor.
Level 4 – Moderate Dinginess	<ul style="list-style-type: none"> • Floors are swept or vacuumed clean, but are dull, dingy, and stained; a noticeable buildup of dirt or floor finish can be seen in corners and along walls; • a dull path or obviously matted carpet in the walking lanes can be seen; base molding is dull and dingy with streaks or splashes; • all vertical and horizontal surfaces have conspicuous dust, dirt, marks, smudges, and fingerprints; • lamp fixtures are dirty, and some lamps (up to 5.0 percent) are burned out; • trash containers and pencil sharpeners have old trash and shavings; they are stained and marked; and • trash containers smell sour.
Level 5 – Unkempt Neglect	<ul style="list-style-type: none"> • Floors and carpets are dull, dirty, scuffed, or matted; a conspicuous buildup of old dirt or floor finish can be seen in corners and along walls; base molding is dirty, stained, and streaked; gum, stains, dirt, dust balls, and trash are broadcast; • all vertical and horizontal surfaces have major accumulations of dust, dirt, smudges, and fingerprints, all of which will be difficult to remove; lack of attention is obvious; • light fixtures are dirty with dust balls and flies; many lamps (more than 5.0 percent) are burned out; and • trash containers and pencil sharpeners overflow; they are stained and marked; trash containers smell sour.

SOURCE: APPA: Leadership in Educational Facilities, November 2016.

the district to understand where staffing shortages may exist by providing faculty and administrative staff with a way to document their needs regarding custodial support.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

- The district maintenance staff are primarily tradespeople, each with a specific area of expertise. The district may be able to increase efficiency in its use of resources by evaluating the structure and assignment of maintenance staff. This evaluation could include prioritizing the use of general staff who can perform routine maintenance over the use of more costly, specialized tradespeople.
- The district minimized the use of portable buildings through construction and secured additional revenue by auctioning unused portables.
- The district does not have any in-house or contract project management staff to represent the district's best interests in the construction process. The district may consider staffing a construction project manager when conducting major renovations or new construction.

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	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 6. FACILITIES MANAGEMENT							
17. Develop a comprehensive procedures manual to address key responsibilities and functions related to facilities management, use, and maintenance.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
18. Establish district goals, expectations, and timelines for facilities planning.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
19. Adopt a comprehensive custodial staffing model, procedures, cleanliness standards, and a system for soliciting stakeholder feedback.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 7. SAFETY AND SECURITY

An independent school district's safety and security function identifies vulnerabilities and includes strategies to minimize risks to ensure a protected learning environment for students and staff. This protection includes a balanced approach of prevention, intervention, enforcement, and recovery. Risks can include environmental disasters, physical hazards, security threats, emergencies, and human-caused crises.

Managing safety and security initiatives is dependent on a district's organizational structure. Larger districts typically have staff dedicated to safety and security, and smaller districts assign staff tasks as a secondary assignment. Safety and security include ensuring the physical security of a school and its occupants. A comprehensive approach to planning for physical security considers school locking systems; monitoring systems; equipment and asset protection; visibility of areas and grounds; police and school resource officers; and emergency operations. Emergency and disaster-related procedures must include fire protection, environmental disasters, communication systems, crisis management, and contingency planning. To identify physical hazards, a school district must consider playground safety and overall building and grounds safety. Environmental factors, such as indoor air quality, mold, asbestos, water management, and waste management, also affect the safety of school facilities.

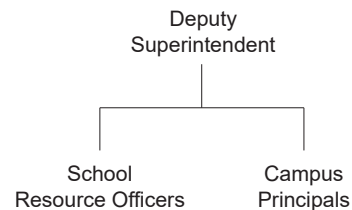
One of the stated objectives of public education in the Texas Education Code is to "provide safe and disciplined environments conducive to learning." To achieve this objective, safety and security operations go hand-in-hand with education, as districts are responsible for protecting students, teachers,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

A safe and secure school environment as defined by the U.S. Department of Education, Title IV, Section 401, 21st Century Schools and the Safe and Drug-free Schools and Communities Act, encompasses communication systems, fire protection, playground safety, facility safety, environmental regulations, and emergency operation planning.

Lockhart Independent School District's (ISD) deputy superintendent oversees safety and security in the district. Lockhart ISD participates in an interlocal cooperation agreement with the City of Lockhart for two school resource officers (SRO). One SRO works with the junior high school campus, and one SRO works with the high school campus. Campus principals manage safety and security for each campus. Campus principals report to the deputy superintendent. The Lockhart Police Department (LPD) chief assigns an officer to supervise the SROs, and the deputy superintendent is responsible for district oversight of the SROs. **Figure 7–1** shows the Lockhart ISD staff responsible for the safety and security function.

Lockhart ISD maintains surveillance cameras with remote-access capabilities at all campuses, and the district recently invested in camera upgrades for instructional and auxiliary

FIGURE 7–1
LOCKHART ISD SAFETY AND SECURITY STAFF
NOVEMBER 2017



SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

facilities. The deputy superintendent conducted the 2017 safety audit pursuant to the Texas Education Code, Section 37.108, and reported the results to the Texas School Safety Center (TxSSC).

Figure 7–2 shows Lockhart ISD's security and monitoring expenditures compared to state expenditures for school years 2013–14 to 2016–17. Lockhart ISD's per-student expenditures for security and monitoring and percentage of total expenditures were less than state averages for all four school years.

**FIGURE 7-2
LOCKHART ISD AND STATE SECURITY AND MONITORING EXPENDITURES
SCHOOL YEARS 2013-14 TO 2016-17**

EXPENDITURES	2013-14	2014-15	2015-16	2016-17
Lockhart ISD	\$206,175	\$115,895	\$144,150	\$152,588
Lockhart ISD Percentage of Total Expenditures	0.5%	0.3%	0.3%	0.3%
Lockhart ISD Expenditures per Student	\$40	\$22	\$27	\$27
State Average Percentage of Total Expenditures	0.9%	0.9%	0.9%	0.9%
State Average Expenditure per Student	\$74	\$79	\$84	\$88

SOURCE: Texas Education Agency, Public Education Information Management System financial data, school years 2013-14 to 2016-17.

ACCOMPLISHMENTS

- ◆ Lockhart ISD installed security vestibules at the entrances to all campuses, external lockboxes, and electrical shutdown boxes to improve the safety of students and staff.
- ◆ Lockhart ISD has a collaborative relationship with city managers and local fire safety and law enforcement officials to address the needs of students and to plan for emergencies.
- ◆ Lockhart ISD’s SRO program partners with the Lockhart Police Department to provide a more secure environment and to foster a positive relationship among students and law enforcement.

FINDINGS

- ◆ Lockhart ISD lacks comprehensive documentation of safety and security procedures.
- ◆ Lockhart ISD lacks an adequate monitoring process to ensure emergency plans are consistent, updated, and include required components for all campuses.
- ◆ Lockhart ISD visitor management procedures are inconsistent across district campuses and facilities.

RECOMMENDATIONS

- ◆ **Recommendation 20: Develop a procedural manual to guide the safety and security operations in the district and to document leadership directives.**
- ◆ **Recommendation 21: Revise campus emergency operations plans and monitor plans to ensure consistency and compliance with statutory requirements.**

- ◆ **Recommendation 22: Strengthen controls of visitor management to ensure consistency and safety of students and staff districtwide.**

DETAILED ACCOMPLISHMENTS

SECURITY UPGRADES

Lockhart ISD installed security vestibules at the entrances to all campuses, external lockboxes, and electrical shutdown boxes to improve the safety of students and staff.

National School Safety and Security Services (NSSSS), a national safety and security consultant, recommends that districts reduce and control campus access. NSSSS recommends reconfiguring main entrances to provide a secondary set of secure doors and to direct all traffic into the main office before visitors can gain access into the campus. To further increase security, districts should control the exterior door buzzer with a camera and intercom system, thereby requiring visitors to be admitted electronically through the first door and directed through a second door (which also could be controlled electronically, if appropriate) before they are provided access into the main building.

Before school year 2017-18, the district installed security vestibules in the instructional facilities to provide increased control of access. These vestibules enable a delay before a visitor fully enters for the campus staff to verify their identity. This verification prevents unauthorized visitors and ensures a record of visitors.

Lockhart ISD also has external lockboxes that enable emergency staff to access the building if the situation does not enable alternate access. Lockhart ISD has ensured the installation of external shutdown boxes to cut off power in the event of an emergency. These best practices align with NSSSS guidelines for the most effective strategies to reduce and control campus access.

The district prioritized the upgrades to improve security for students and staff, and funded the upgrades through bond funds and the maintenance and operation budget of its general fund.

SECURITY TASK FORCE

Lockhart ISD has a collaborative relationship with city managers and local fire safety and law enforcement officials to address the needs of students and to plan for emergencies.

The district convened a task force of community safety experts during school year 2017–18 to review results of the safety audit and conduct a comprehensive review of campus emergency operation procedures.

The task force included broad representation, including counselors, teachers, nurses, custodial staff, transportation vendor staff, emergency medical services, fire department staff, police department staff, and the county emergency management coordinator.

The task force began thorough reviews of campus emergency operation plans (EOP), beginning with the newest campus, Alma Brewer Strawn Elementary. The task force suggested modifications to the campus EOPs to improve safety and address oversights, such as procuring medical stair stretchers for campuses with stairs.

District staff maximized the effectiveness of the task force by including local safety experts and emergency service providers.

SCHOOL RESOURCE OFFICERS

Lockhart ISD's SRO program partners with the Lockhart Police Department to provide a more secure environment and to foster a positive relationship among students and law enforcement.

The interlocal cooperation agreement's purpose is to "set forth guidelines to ensure that Lockhart Police Department and Lockhart ISD have a shared understanding of the role and responsibility of each in maintaining safe schools, improving climate, and supporting educational opportunities for all students."

The agreement also documents that the "mission of the SRO program is to place community law enforcement officers in the Lockhart ISD campuses to build working relationships with schools, students, and parents; to address onsite security; to maintain safe schools; to serve as a positive role model for

students; and to provide a direct link with the Lockhart Police Department."

The agreement outlines the SRO Program Structure, including establishing that SROs are first and foremost law enforcement officers for the City of Lockhart. The agreement also requires that noncriminal student discipline remains the responsibility of Lockhart ISD staff, not the SROs. The agreement also stipulates that SROs may serve as law enforcement resources to assist students and staff, but that they are not formal counselors or educators, and will not act as such.

The agreement defines the responsibilities of the city and the district, and includes detailed human resources, such as procedures for scheduling vacation time, reporting absences, and accruing compensatory time. Lockhart ISD staff have the authority to approve SRO staffing decisions and changes, including approval of officers assigned as substitutes.

The agreement states that SRO duties include, but are not limited to the following:

- establish a bond and act as a liaison among the LPD and school administrators and students to reduce or eliminate the opportunity for crime, project a positive image of the LPD, and improve the quality of life within the school and community;
- patrol areas within or near the district's geographical boundaries to protect all students, staff, and visitors;
- help Lockhart ISD administrators maintain the peace and address a breach of the peace as needed;
- engage in all law enforcement activities arising from the enforcement of criminal laws or Lockhart ISD policies and rules, including but not limited to intervening in and investigating alleged crimes or violations of Lockhart ISD rules, issuing citations, transporting arrested persons completing follow-up activities, filing of affidavits and complaints, and participating in legal proceedings resulting from the law enforcement services provided in accordance with the agreement;
- mediate disputes on campus, including working with students to help solve disputes in a nonviolent manner;
- assist with school safety projects, scheduling and maintaining emergency drills, emergency response, and after-action reviews within Lockhart ISD;

- serve as a resource for law enforcement education at the request of the Lockhart ISD superintendent, such as speaking to classes about the law, search and seizure, drugs, or motor vehicle laws; and
- perform other duties that may be assigned by Lockhart ISD, if the duties are legitimately and reasonably related to the services described in the agreement and are consistent with federal and state law; local ordinances and orders; laws applicable to Lockhart ISD; Lockhart ISD’s policies, procedures, rules, or regulations relating to the subject matter of the agreement; and the policies, procedures, rules, and regulations of the city.

The interlocal cooperation agreement includes a comprehensive cost summary used to calculate the financial responsibilities of the district and the city. The cost summary includes salary, benefits, vehicle and maintenance costs, and uniforms and equipment costs. Lockhart ISD pays for the school year expenses, and the city is responsible for the summer months when school is not in session. The cost summary sets the useful life of uniforms at five years and of vehicles at eight years. The district is responsible for a percentage of the annual costs. According to the agreement, the total SRO program costs for school year 2017–18 are \$123,792.

The Legislative Budget Board’s School Performance Review Team visited the district in November 2017. **Figure 7–3** shows the results of the review team’s survey of district and campus staff for school year 2016–17. None of the district staff surveyed disagreed or strongly disagreed with the statements “security personnel have a good working relationship with principals and teachers” and “a good

working relationship exists between local law enforcement and the district.” Less than 5.0 percent of campus staff surveyed disagreed or strongly disagreed with the statement “security personnel are respected and liked by the students they serve.”

The district increased staffing from one SRO to two SROs for school year 2017–18. The district funded the majority of the increased SRO program costs with funds received through participation in a school safety research grant. District and campus staff reported positive results from the staffing increase, especially the SRO program’s ability to support both the high school and junior high school campuses.

DETAILED FINDINGS

PROCEDURES (REC. 20)

Lockhart ISD lacks comprehensive documentation of safety and security procedures.

During the summer before school year 2017–18, the superintendent reassigned safety and security responsibilities to the deputy superintendent. District staff reported that the effectiveness of safety and security oversight improved with the reassignment of duties. However, many of the processes in place for safety and security in the district are informal and lack written documentation.

The district’s Student Handbook, Student Code of Conduct, and Employee Handbook provide basic guidelines but lack detailed procedures to implement district guidelines and other policies. The campus EOPs provide additional written guidelines for areas such as student–parent reunification and preventive measures. However, the procedures are not

**FIGURE 7–3
LOCKHART ISD SURVEY RESULTS
SCHOOL YEAR 2016–17**

RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE	SURVEY COUNT
Security personnel have a good working relationship with principals and teachers.						
District Staff	26.7%	43.3%	30.0%	0.0%	0.0%	30
Campus Staff	15.1%	41.3%	40.0%	2.7%	0.9%	225
A good working arrangement exists between local law enforcement and the district.						
District Staff	36.7%	43.3%	20.0%	0.0%	0.0%	30
Campus Staff	16.1%	54.5%	26.3%	1.8%	1.3%	224
Security personnel are respected and liked by the students they serve.						
Campus Staff	8.5%	42.0%	44.6%	4.0%	0.9%	224

NOTE: Totals may not sum to 100.0 percent due to rounding.
SOURCE: Legislative Budget Board School Performance Review Team, November 2017.

documented consistently in EOPs, and these documents are not developed or disseminated in the style of procedural manuals.

The district's safety documentation includes the interlocal cooperation agreement with the city and written visitor protocols. These protocols include detailed descriptions of the access controls and visitor management procedures used in district instructional facilities. However, the district lacks written procedures for other safety and security processes and tasks.

The Texas Education Code, Section 37.109, requires school districts to establish a school safety and security committee. The school safety and security committee is required to develop and implement emergency plans consistent with the district's multihazard emergency operations plan. The committee's participation helps to ensure that the emergency plans reflect specific campus, facility, or support services needs. The committee also is required to provide the district with any campus, facility, or support services information required in connection with a safety and security audit. The committee must review each report submitted to TxSSC to ensure that the report contains accurate and complete information, in accordance with TxSSC criteria.

The deputy superintendent organized a safety and security task force, including external experts that carried out these required responsibilities. However, the deputy superintendent indicated that she had not designated the task force formally as the district's safety and security committee.

The deputy superintendent has not documented the work and composition of the task force, which might have led to inconsistent meeting notices for all members or inconsistent attendance. This informal structure has resulted in members not being included in all subsequent meetings of the task force.

Board Policy CK (LEGAL) documents the safety and security committee expectations pursuant to the Texas Education Code. However, the district lacks written procedures for the committee, such as types of staff, stakeholders, and safety experts to represent; schedules; agendas; communication guidelines; or detailed steps for conducting required tasks.

In the event of unexpected turnover, new district leadership staff may not include a broad selection of internal and external experts and stakeholders. Without the documentation of the safety and security procedures, the district could risk

ineffective, inefficient, or inconsistent establishment and operation of the district's safety and security committee.

The deputy superintendent oversaw the 2017 safety audit pursuant to the Texas Education Code, Section 37.108. She had an informal system for managing outstanding audit recommendations by listing all items and crossing them off as addressed. The list's placement in the deputy superintendent's office enabled her to remain aware of uncompleted tasks.

However, in the event of staff turnover, incoming staff might lack the documentation necessary to continue implementation of the outstanding audit recommendations. Without written procedures for district expectations, new staff could fail to conduct and implement audits effectively. Lockhart ISD's informal safety audit process and informal safety and security committee place district safety at risk in the event of staff turnover.

The district lacks written procedures for soliciting stakeholder feedback regarding safety and security. District staff increased SRO staffing in response to community feedback, but the process was informal. Parents and other representatives of the community reported investing considerable effort to persuade district staff to address their concerns.

District staff have not developed written documentation to ensure diverse, well-publicized systems to provide all stakeholders with opportunities to provide input specifically into safety and security. District staff have not documented expectations for the types and frequency of surveys or other instruments to administer, the analysis and response to input, and methods and frequency for informing stakeholders of the results.

Without written documentation of safety and security procedures, Lockhart ISD staff, students, and community members could lack guidance for appropriate behaviors in certain situations. The district's lack of documented procedures could be an obstacle to consistent compliance with state statutes. Inadequate communication with the community can degrade the credibility of district leadership and erode confidence in the overall safety and security of Lockhart ISD campuses. **Figure 7-4** shows the review team's survey results for school year 2016-17. More than 25.0 percent of parents surveyed disagreed or strongly disagreed with the statements "safety hazards do not exist on school grounds" and "students feel safe and secure at school."

Effective districts maintain written procedures for safety and security by developing and regularly updating comprehensive procedural manuals.

TxSSC’s website includes School Safety and Security Committee Guidelines and sample committee meeting agendas as resources for Texas school districts. TxSSC recommends that the committee meets once a semester or more to review and update the district’s EOP. Districts also should document committee meetings, maintain records in accordance with district policy, and develop a communication plan to disseminate committee information to stakeholders. TxSSC indicates that external safety experts can serve as collaborative partners to support district safety and security committees, and suggests that committee membership should include representation from the following areas:

- superintendent and deputy superintendent;
- emergency management coordinator and school-based law enforcement;
- student services and special programs;
- health, mental health, counselors, and social work;
- finance, technology, and human resources departments;
- facilities and support services, food services, transportation, and athletics departments;
- the board of trustees; and
- campus representatives from each level.

The National Crime Prevention Council’s School Safety and Security Toolkit: A Guide for Parents, Schools, and Communities, published in 2009, is a best practice resource that includes detailed strategies to collect community input regarding safety and security issues. The guide recommends a community forum to gain insight into community

perceptions and to ask for assistance in developing safety and security plans. The guide provides helpful detail about planning, advertising, and conducting the forum.

Lockhart ISD should develop a procedural manual to guide the safety and security operations in the district and to document leadership directives.

The deputy superintendent should draft a comprehensive safety and security manual for the district. The deputy superintendent should meet with the superintendent to outline the areas for procedure development, such as the following elements:

- roles and responsibilities of security staff;
- expectations for the district safety and security committee;
- reporting and monitoring incidents;
- process for conducting, reviewing, and reporting safety audits;
- action plan for safety and security recommendations;
- making safety and security recommendations;
- monitoring compliance with regulatory requirements;
- safety and security service contracts and vendor evaluation; and
- collecting community input regarding safety and security issues.

The deputy superintendent should review procedural manuals from other school districts and national standards to assist in identifying standards to include in the district’s manual. The superintendent should present the outline to the board for additional input and provide examples of procedural manuals from other districts. After the board has approved the procedures manual’s direction, the deputy

FIGURE 7–4
LOCKHART ISD SURVEY RESULTS
SCHOOL YEAR 2016–17

RESPONDENTS	STRONGLY AGREE	AGREE	NO OPINION	DISAGREE	STRONGLY DISAGREE
Safety hazards do not exist on school grounds.					
Campus Staff	3.6%	39.6%	24.9%	25.8%	6.2%
Parents	6.8%	27.9%	37.3%	20.2%	7.7%
Students feel safe and secure at school.					
Parents	12.0%	39.9%	19.4%	22.2%	6.6%

NOTE: Totals may not sum to 100.0 percent due to rounding.
 SOURCE: Legislative Budget Board School Performance Review Team, November 2017.

superintendent should draft it for the superintendent's review and modifications. The superintendent should submit the final draft to the board for approval and adoption.

The district could implement this recommendation with existing resources.

EMERGENCY OPERATIONS PLANNING (REC. 21)

Lockhart ISD lacks an adequate monitoring process to ensure emergency plans are consistent, updated and include required components for all campuses.

The Texas Education Code, Section 37.108, requires each school district to adopt and implement a multihazard EOP for use in district schools. The EOP should address mitigation, preparedness, response, and recovery for various natural and human-made crises.

The deputy superintendent provides EOP templates and requires each campus administrator to develop a site EOP. Teachers and staff receive annual training regarding EOP procedures at the campus level before the start of the school year. The deputy superintendent required all campus administrators to submit updated EOPs for school year 2017–18. However, district staff do not monitor the content of campus EOPs adequately to ensure consistent, updated plans including all components required by state and national statutes and best practices.

For example, the Texas Education Code, Section 37.108, requires each campus EOP to contain a policy for responding to a train derailment near a district school if the district school is located within 1,000 yards of a railroad track. However, the deputy superintendent indicated that the district had not developed train derailment plans for any campuses. The physical addresses of multiple campuses are within 1,000 yards of railroad tracks. District staff provided the review team with documents confirming that the affected campuses' EOPs do not address their proximity to railroads.

The Texas Education Code, Section 37.108, also requires the multihazard emergency operation plan to ensure coordination with the Texas Department of State Health Services (DSHS) and local emergency management agencies, law enforcement, health departments, and fire departments. This coordination can help ensure that safety plans will not conflict with existing local emergency services protocols. Although campus EOPs include contact information for city police, county sheriffs, and the fire department, Lockhart ISD plans do not address DSHS or the city health department. These plans

also do not ensure coordination effectively with local emergency services.

Lockhart ISD does not have a process to monitor all campus EOPs adequately for consistency and accuracy. For example, the Texas Education Code, Section 37.108, requires districts to establish mandatory school drills and exercises to prepare district students and staff for responding to an emergency. Although most campus EOPs establish emergency drills, expectations for drills are inconsistent among campuses. Lockhart Junior High School's EOP schedules fire drills at least once a month; Carver Early Education Center's EOP schedules monthly fire drills and schedules tornado and lockdown drills in the fall and spring; and Plum Creek Elementary School's EOP states that fire drills and other emergency drills will begin in September and continue monthly. Lockhart Discipline Management Center's EOP does not include any drill schedules or procedures, and Navarro Elementary School's EOP indicates that drill dates will be posted to the calendar of a different campus, Clear Fork Elementary School.

Other examples of inconsistencies and inaccuracies in campus EOPs include differing response procedures for gas leaks, variations in bat-integrated pest-management procedures, outdated contact information for district staff, and a lack of SRO role descriptions for Lockhart High School and Lockhart Junior High School.

Additional gaps exist in Lockhart ISD's emergency preparedness, including the following areas:

- no drills conducted for noninstructional facilities to ensure safety of all district staff;
- inconsistency with implementation of district security initiatives, such as the use of magnetic strips in doorways;
- variation in expectations for door and window covers; and
- inconsistency with what supplies and documents teachers need for emergency preparedness drills, and who provides them.

Inadequate disaster preparedness could affect the district negatively in a crisis, such as severe weather or dangerous intruders on district property. Without effective oversight of plans developed for each campus, the district risks a disorganized or inconsistent response to crises. Lack of effective coordination with local safety entities and DSHS could result in protocols that conflict with existing emergency

service protocols or insufficient external support in a crisis. Without train derailment plans, students and staff could be in danger if a train derailed or spilled hazardous materials.

Effective districts guide and monitor the development of EOPs to ensure that emergency planning aligns with state and national best practices and statutory requirements. For example, Duncanville ISD's crisis management plan, which is available on its district website, includes a train derailment plan. The plan addresses the need to move students and staff upwind in the case of hazardous material spills related to train derailment.

TxSSC offers a variety of toolkits for emergency planning, including the standard response protocol kit for kindergarten to grade 12, a standard response protocol workbook for prekindergarten to grade two, a school pipeline safety toolkit, and a severe weather toolkit. The Federal Emergency Management Agency (FEMA) publication *Guide for Developing High-quality School Emergency Operations Plans* is a best practice for school emergency planning. FEMA also recommends that key individuals within the district and those with a role in district and campus emergency operations complete free online trainings. Trainings include the Incident Command System for Schools, National Incident Management System, and Multihazard Emergency Planning for School. These courses are available at no cost on the FEMA website.

Lockhart ISD should revise campus emergency operations plans and monitor plans to ensure consistency and compliance with statutory requirements.

Lockhart ISD staff should use the TxSSC template as a model for plans for the district students' needs. TxSSC staff can serve as a resource during the planning phase.

Lockhart ISD's deputy superintendent should supervise the development of train derailment plans for all affected campuses. The deputy superintendent should identify internal and external stakeholders, such as the safety and security committee, to participate in the process.

The deputy superintendent should oversee the development of requirements for emergency preparedness drills at noninstructional facilities to be scheduled regularly.

The deputy superintendent should revise template documentation for recordkeeping and reporting of emergency drills conducted to include all facilities that are populated by district students and staff.

The district could implement this recommendation with existing resources.

VISITOR MANAGEMENT (REC. 22)

Lockhart ISD visitor management procedures are inconsistent across district campuses and facilities.

The Lockhart ISD Campus Visitor Protocols defines the visitor policy and requirements for gaining entrance to a school site. The protocols state, "All visitors, including parents/guardians, must sign in at the reception desk and receive proper authorizations to be in the school. Visitors will be given a visitor sticker to wear while on campus. Student visitors must have prior authorization from the principal or designee before entering the school site. Unless prearranged, visitors are not authorized to visit classrooms, walk around campus, including the library, cafeteria, gym, etc., during the instructional school day, including before and directly after school hours."

The Lockhart ISD Campus Visitor Protocols exclude terms regarding a signout or checkout policy for visitors. The policy addresses visitor access and protocols for what to do if an unauthorized visitor has gained access to the site.

During the onsite review, the review team observed that the check-in process was consistent at nearly all facilities; however, the checkout process varied among school sites. In many instances, campuses required visitors to return their badges to the individual who provided the badge and authorization to the site. However, it was the visitor's responsibility to stop by the security vestibule check out; campuses had little to no reinforcement to ensure that visitors checked out. Visitors were required to check in formally at the security vestibule, including providing identification for a background check. However, no school site required visitors to check out via hard-copy or electronic logout. The electronic badge system clearly defines the time the visitor entered the facility, but staff do not use the system consistently to record similar data for when visitors exit the facility.

In addition to inconsistent checkout procedures, Lockhart ISD does not implement visitor management procedures in noninstructional facilities.

The administrative buildings contain district leadership and administrative staff offices. These noninstructional facilities do not have the same access controls and visitor management procedures as the instructional campuses. Visitors are required to sign in with either paper or computer-based

systems, but they are not required to show identification or submit to a background check through the district's visitor management system. The administrative facilities also lack secure vestibules or electronic locking systems for external doors.

Without effective visitor management protocols for checkout, staff are unaware when visitors are no longer present onsite. In an emergency, staff would not know if visitors are at the school site and how many are present. To protect the safety of the staff and students, effective practices are that staff should know the headcount onsite at all times. Limited visitor management protocols for noninstructional facilities may leave staff vulnerable to security risks. NSSSS recommends the following practices:

- develop a visitor signout and escort procedure;
- train all staff, including support staff, to greet and challenge strangers; train staff to report strangers to the office if they do not feel safe in approaching someone they believe to be an intruder;
- train students not to open doors to strangers, other students, or even adults they may know; and
- educate parents about access-control strategies and the importance of visitors following the rules.

Lockhart ISD should strengthen controls of visitor management to ensure consistency and safety of students and staff districtwide.

Lockhart ISD should standardize the checkout process. The deputy superintendent should oversee the development of visitor checkout protocols and add them to the Lockhart ISD Campus Visitor Protocols.

The deputy superintendent or designee should provide training to the appropriate staff responsible for visitor check-in and checkout to ensure that visitors adhere to the checkout protocols.

The deputy superintendent should distribute the updated protocols to students and parents annually and post to the district's website for potential alumni, guest speakers, and special one-time visitors.

The deputy superintendent should develop visitor management protocols for noninstructional facilities that align with industry best practices. The deputy superintendent should consider the need for purchasing additional equipment and software to expand visitor management

software with background check capability to noninstructional, staffed facilities in the district. The deputy superintendent should add these protocols to the Lockhart ISD Campus Visitor Protocols, distribute them to district staff working in noninstructional facilities, and train all appropriate staff to ensure adherence to the new protocols.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

The district's interlocal cooperation agreement with the City of Lockhart includes 10 LPD Narcotic Drug Detection Dog searches throughout the school year for the district at no cost. The district also maintains campus-level contracts for additional canine contraband services. District staff should evaluate the necessity of additional canine contraband services before renewing contracts.

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	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 7. SAFETY AND SECURITY							
20. Develop a procedural manual to guide the safety and security operations in the district and to document leadership directives.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21. Revise campus emergency operations plans and monitor plans to ensure consistency and compliance with statutory requirements.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22. Strengthen controls of visitor management to ensure consistency and safety of students and staff districtwide.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0

CHAPTER 8. FOOD SERVICES

An independent school district's food service operation provides meals to its students and staff. The district may provide meals through the federally funded Child Nutrition Programs, which include the School Breakfast and National School Lunch programs. The School Breakfast Program (SBP) is a federal entitlement program administered at the state level by the Texas Department of Agriculture (TDA). Participating schools receive cash assistance for breakfasts served that comply with program requirements. Districts receive different amounts of reimbursement based on the number of breakfasts served in each of the benefit categories: free, reduced-price, and paid. Texas state law requires schools to participate in the breakfast program if at least 10.0 percent of their students are eligible to receive free or reduced-price meals. The National School Lunch Program (NSLP) serves low-cost or free lunches to students. Like the breakfast program, lunches must comply with federal nutrition guidelines and are reimbursable to schools based on the number of meals served within the benefit categories. A district's food service operation may also offer catering services to supplement the food services budget or provide training for students interested in pursuing a career in the food service industry.

The food service operation is dependent on the organizational structure of the district. The two primary models of organizing food service operations are self-management and contracted management. Using the self-management model, a district operates its food service department without assistance from an outside entity. Using a contracted management model, a district contracts with a food service management company (FSMC) to manage either all or a portion of its operations. In this arrangement, a district may rely on the company to provide all or some staff, or may use district staff for its operations.

Lockhart Independent School District (ISD) participates in the SBP and the NSLP, the Child and Adult Care Food Program (CACFP) and the Seamless Summer Option (SSO), collectively referred to as the Child Nutrition Programs (CNP). The CACFP provides aid to child and adult care institutions and family or group day care homes for the provision of nutritious foods that contribute to the wellness, healthy growth, and development of young children, and the health and wellness of older adults and chronically impaired

disabled persons. The SSO allows approved school districts to serve meals during the summer free of charge to children, 18 years and under, from low-income areas. Lockhart ISD also receives donated foods through the United States Department of Agriculture (USDA) Foods Distribution Program.

The district uses the contracted management model to organize food service operations. In school year 2016–17, Lockhart ISD contracted with Southwest Food Excellence (SFE), an FSMC, to operate the CNP in the district.

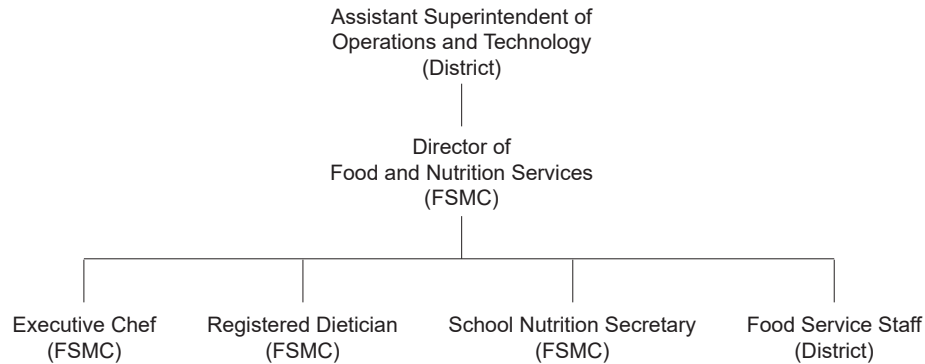
The Food Services Department includes four FSMC staff and 43 food service district staff. The four FSMC staff include the director of food and nutrition services, the executive chef, the registered dietician, and the school nutrition secretary. The 43 food service district staff report to the FSMC director. The Lockhart ISD assistant superintendent of operations and technology is the liaison to the FSMC, the district's contact with TDA, and he approves the free and reduced-price meal applications.

Figure 8–1 shows the district's reporting structure for the Food Services Department.

The director of food and nutrition services oversees the district's food service programs and reports to the assistant superintendent of operations and technology. The director of food and nutrition services ensures compliance with federal, state, and program requirements and develops and administers the food service budget. The director of food and nutrition services evaluates all FSMC and district food services staff. The executive chef directs daily operations of food production and is responsible for all catering activities. The registered dietician plans the menus and performs dietary analyses. The registered dietician also visits the cafeterias to ensure staff follow recipes correctly. The school nutrition secretary processes applications, prepares bills and catering invoices and other office management duties.

Lockhart ISD has eight cafeterias. All food preparation is onsite. The district uses NutriKids, a point-of-sale (POS) software for counting and claiming reimbursable meals. District custodial staff clean the dining rooms. All campuses are closed except for the high school where seniors can leave campus during lunch.

FIGURE 8–1
LOCKHART ISD FOOD SERVICES DEPARTMENT ORGANIZATION
SCHOOL YEAR 2017–18



NOTE: FSMC=Food Service Management Company

SOURCES: Legislative Budget Board School Performance Review Team; Lockhart ISD, November 2017.

In school year 2016–17, the Food Services Department had \$3,589,886 in revenue and \$3,564,295 in expenditures, with an excess of \$25,591 revenue over expenditures.

During October 2017, the average daily participation (ADP) in the NSLP was 59.0 percent of 6,206 enrolled students, and the ADP in the SBP was 60.0 percent. During the same month, 70.0 percent of enrolled students qualified for free and reduced-price meals.

ACCOMPLISHMENT

- ◆ Lockhart ISD implemented several strategies to successfully increase the number of students approved for free and reduced-price meals.

FINDINGS

- ◆ Lockhart ISD campuses use inconsistent and inaccurate methods to record the number of breakfasts served in the classroom and ensure accurate claims for reimbursement.
- ◆ Lockhart ISD student participation in the Child Nutrition Programs is low at some campuses.
- ◆ Lockhart ISD food services staff do not consistently ensure that students select meals that comply with the Offer versus Serve provision of the federal National School Lunch and School Breakfast Programs.

RECOMMENDATIONS

- ◆ **Recommendation 23: Coordinate with the food service management company to ensure that teachers count and claim breakfasts for accurate reports of reimbursable meals in accordance with written procedures and federal regulations.**
- ◆ **Recommendation 24: Ensure that the food service management company promotes maximum participation in the Child Nutrition Programs.**
- ◆ **Recommendation 25: Monitor the food service management company to ensure that meals claimed for reimbursement comply with Offer versus Serve requirements for breakfast and lunch.**

DETAILED ACCOMPLISHMENT

FREE AND REDUCED-PRICE APPLICATIONS

Lockhart ISD implemented several strategies to successfully increase the number of students approved for free and reduced-price meals. During school year 2016–17, the district enforced a charge policy to limit the amount of unpaid meal charges a student could accrue. Although the implementation of the charge policy helped reduce the amount of unpaid charges, an unintended consequence was a reduction in meal participation. In response to the participation decrease, the district established a goal to work with the FSMC to increase the number of household applications submitted to identify as many eligible students

as possible. Since numerous students charged meals prior to the charge policy implementation, district administration suspected that many unidentified households might qualify for meal benefits.

Collecting household applications from families is a common challenge that many school districts face. Before school year 2017–18, the district's primary efforts to garner application submissions included providing paper applications in student registration packets and notifying parents through email. To encourage more households to apply for meal benefits, the district implemented several new outreach methods in school year 2017–18. Some of these included:

- creative advertising posted at the campuses identifying the amount of money families could save if they apply and are approved for meal benefits;
- an open house at the beginning of the school year with food samples and food service staff available to answer questions;
- assistance with completing free and reduced-price applications during meet the teacher events;
- signage at a local public library to promote the meal program and the free and reduced-price application process; and
- phone calls and letters to families that qualified the prior year but did not submit new applications.

As a result of these efforts, the district increased the number of applications and the number of students approved for free-reduced price meals in school year 2017–18. According to the director of food and nutrition services, the district received 1,540 applications in school year 2016–17 and received approximately 1,700 applications by the end of October 2017. In addition, during October 2017, the district approved 70.0 percent of students for free and reduced-price meals, an increase over the 68.0 percent of students that the district approved in school year 2016–17.

DETAILED FINDINGS

BREAKFAST IN THE CLASSROOM PROCEDURES (REC. 23)

Lockhart ISD campuses use inconsistent and inaccurate methods to record the number of breakfasts served in the classroom and ensure accurate claims for reimbursement.

Lockhart ISD implements Breakfast in the Classroom (BIC) at all elementary campuses and at the junior high school. BIC is an alternative meal service model designed to improve

access and participation in the SBP by providing breakfasts to students at the beginning of a morning class, often while the teacher is taking attendance or giving classroom announcements. In Lockhart ISD, BIC is a successful program with high participation at all grade levels where the program is implemented. However, opportunities exist for Lockhart ISD to improve the implementation of the program to ensure consistency and compliance with SBP regulations across all campuses.

Breakfasts served in the classroom must meet the same program requirements as breakfasts served in the traditional cafeteria-based model to be reimbursable through the SBP. Reimbursable breakfasts must contain a fruit, milk and a grain, and must be counted in a manner that ensures the number of breakfasts claimed is accurate.

Lockhart ISD submitted to TDA the district's collection procedures for BIC in the Policy Statement for Free and Reduced-Price Meals, Attachment B: Meal Count/Collection Procedures as part of their application to participate in the CNP. Lockhart ISD submitted procedures that provide an accurate counting and claiming system.

To implement the procedures, the FSMC includes written instructions for BIC in the coolers containing breakfast items that food services staff deliver to classrooms each morning. **Figure 8–2** shows the BIC instructions the FSMC provides to teachers.

Although the district's written procedures for BIC describe a process that complies with program requirements, the Legislative Budget Board (LBB) school review team observed that teachers did not consistently follow the procedures.

The review team observed 10 classrooms at Bluebonnet Elementary School. Six classrooms followed BIC procedures correctly, and students took all items offered and placed unwanted items on a share table. The review team noted issues with BIC implementation in four classrooms. Issues observed included:

- Teachers checking off students on the roster prior to students' arrival in class and not following up to ensure they actually took a meal;
- A class had 14 students in class and 15 students were checked off the roster; and
- Students only taking items they wanted and teachers not requiring students to take all items offered.

FIGURE 8–2
LOCKHART ISD BREAKFAST IN THE CLASSROOM INSTRUCTIONS
NOVEMBER 2017

- Cafeteria staff deliver coolers to the classroom.
- An informational packet will be in your cooler that includes: the roster.
- All students taking a breakfast must take one of each item offered that day.
- The classroom teacher will manage the roster and place an X in the box if the student took a breakfast, and if the student did not take a breakfast or is absent, place an O in the box.
- Food service must have an accurate count of breakfasts every day.
- All teachers will receive a free breakfast! Please include yourself when you check off the roster.
- If 15 breakfasts are received, and the teacher will mark down 13 X/s on the roster, there should be two entrees, two fruits, and two milks sent back to the cafeteria, or however many items were offered for that breakfast times two, since two people did not receive a breakfast.
- All remaining food can be left in the cooler.
- Foods not taken by students cannot be pooled for later consumption.
- Once a student receives a meal, he or she can save the left overs for a snack later.
- Place the informational packet and roster in the cooler after breakfast.
- Please note: All students will be offered the opportunity to eat breakfast.

SOURCES: Legislative Budget Board School Review Team, November 2017; Lockhart ISD Breakfast in the Classroom Protocols, November 2017.

The review team also observed 12 classrooms at Navarro Elementary School. The review team noted issues with BIC implementation in six classrooms. Issues observed included:

- Students only taking what they wanted and teachers not correcting the issues.
- Teachers allowing students to check off rosters and record breakfasts served.
- Multiple coolers returned with unequal numbers of leftovers for each food item. This indicates that not all students took all breakfast items offered, and teachers counted incomplete meals as reimbursable.

The inconsistent implementation of BIC procedures indicates teachers lack sufficient training on BIC procedures. According to onsite interviews, new teachers receive training on BIC procedures. The assistant superintendent of operations and technology provided a video training that visually demonstrates the BIC process to new teachers in school year 2017-18. However, the district does not provide refresher training to all teachers beyond the initial training.

Further, the review team did not find evidence that FSMC or district staff periodically visit classrooms to monitor BIC.

If Lockhart ISD does not ensure that campuses implement BIC in accordance with written procedures, the district risks losing reimbursement funds. To ensure that school districts implement the CNP in accordance with state and federal requirements, TDA conducts Administrative Reviews (AR) of participating school districts. The AR is a standardized review process developed by USDA that includes a comprehensive on-site and off-site evaluation of districts. One of the critical AR areas is to assess whether the number of meals counted and claimed for reimbursement is accurate, and the meals claimed met meal pattern requirements. Fiscal action could result if an AR monitor notes inaccurate meal counting and claiming for the day for the review and establishes an overclaim. An overclaim is the portion of the district's claim for reimbursement that exceeds the federal financial assistance that is properly paid.

Figure 8–3 shows the value of the overclaim for using inaccurate counting and claiming procedures for breakfast in the classroom.

According to the TDA Administrator’s Reference Manual, effective counting and claiming systems allow a school district to accurately report reimbursable meals served by eligibility category. A best practice many school districts use is to train all teachers at the beginning of the school year on the BIC collection procedures. This training ensures that the teachers perform the counting and claiming procedure in the classroom as it has been approved by TDA in the district’s Attachment B. Training materials often include sample menus that will be used by the program with examples of what items students would need to select to have a reimbursable meal.

Lockhart ISD should coordinate with the food service management company to ensure that teachers count and claim breakfasts for accurate reports of reimbursable meals in accordance with written procedures and federal regulations.

To accomplish this recommendation, the assistant superintendent of operations and technology should coordinate with the director of food and nutrition services to:

- Provide annual training to all teachers and substitutes in the district on the correct counting procedures for BIC as approved by TDA. The director of food and nutrition services should demonstrate when to mark a student’s name on the roster, ensuring that this is completed after each student has received the complete reimbursable meal.
- Monitor meal service to ensure that methods used in the campuses for Breakfast in the Classroom conform to the approved counting and claiming procedures

through periodic site visits. Provide follow-up training as needed.

The district could implement this recommendation with existing resources.

STUDENT PARTICIPATION (REC. 24)

Lockhart ISD student participation in the Child Nutrition Programs is low at some campuses.

In 2007, TDA reported that the statewide participation rate in the SBP was 30.0 percent and the statewide participation in the NSLP was 65.0 percent. Lockhart ISD’s contract with the FSMC requires the FSMC to “promote maximum participation in the Programs.”

At the elementary level, breakfast participation is significantly higher than the statewide average. The average SBP participation at the elementary schools for October 2017 is 83.2 percent. High breakfast participation is due to the implementation of BIC. Lunch participation across the elementary school campuses is also generally higher than the statewide percentage, with a campus average of 73.8 percent participation.

Although student breakfast participation at the elementary schools is robust, the district has not maximized its participation for lunch at some elementary schools, and for both breakfast and lunch at the junior high school and the high schools. **Figure 8–4** shows a comparison of breakfast and lunch participation at each district campus.

As shown in **Figure 8–4**, 11.8 percent of Lockhart High School students participated in the SBP during October 2017, which is significantly lower than the statewide average participation of 30.0 percent. Additionally, several campuses had lower participation in the NSLP than the statewide average of 65.0 percent. Lockhart High School and Lockhart

**FIGURE 8–3
VALUE OF OVERCLAIM FOR INACCURATE COUNTING AND CLAIMING PROCEDURES FOR BREAKFAST IN THE CLASSROOM
MEALS SERVED AT BLUEBONNET ELEMENTARY SCHOOL AND NAVARRO ELEMENTARY SCHOOL
NOVEMBER 28-29, 2017**

MEAL TYPE	NUMBER CLAIMED	REIMBURSEMENT	TOTAL CLAIM FOR NON-REIMBURSABLE MEALS
Free	250	\$2.09	\$522.50
Reduced-price	66	\$1.79	\$118.14
Full price	130	\$0.30	\$39.00
Total	446		\$679.64

SOURCES: Meal Serving Transaction for November 28-29, 2017 for Bluebonnet Elementary School and Navarro Elementary School breakfast; Claim Rates for School Breakfast Program, July 1, 2017 to June 30, 2018.

Junior High School had 41.6 percent and 45.9 percent participation in the NSLP respectively. Clear Fork Elementary School had higher NSLP participation of 57.1 percent, however this percentage is still lower than the statewide average.

According to onsite interviews, both district staff and FSMC staff acknowledged that the district has low meal participation

rates at some campuses. The director of food and nutrition services and the assistant superintendent of operations and technology each described plans to improve participation. The director of food and nutrition services director monitors daily meal counts, evaluates participation numbers and has established a goal to build participation in school year 2017-18. The director of operations and technology indicated that he plans to use surveys to solicit feedback from students to

**FIGURE 8-4
LOCKHART ISD BREAKFAST AND LUNCH PARTICIPATION PERCENTAGES BY CATEGORY
OCTOBER 2017**

CAMPUS	BREAKFAST									TOTAL ADP%
	FREE			REDUCED-PRICE			FULL PRICE			
	ADA ELIGIBLE	ADP	ADP%	ADA ELIGIBLE	ADP	ADP%	ADA ELIGIBLE	ADP	ADP%	
Lockhart High School	817	134	16.4%	165	20	12.1%	714	46	6.4%	11.8%
Lockhart Junior High School	838	519	61.9%	151	96	63.6%	463	273	59.0%	61.2%
Alma Brewer Strawn Elementary School	388	332	85.6%	60	48	80.0%	83	61	73.5%	83.1%
Bluebonnet Elementary School	360	316	87.8%	68	61	89.7%	170	150	88.2%	88.1%
Carver Early Education Center	260	240	92.3%	6	4	66.7%	21	19	90.5%	91.6%
Clear Fork Elementary School	268	201	75.0%	43	32	74.4%	179	132	73.7%	74.5%
Navarro Elementary School	318	204	64.2%	72	42	58.3%	160	86	53.8%	60.4%
Plum Creek Elementary School	436	371	85.1%	72	58	80.6%	94	73	77.7%	83.4%

CAMPUS	LUNCH									TOTAL ADP%
	FREE			REDUCED-PRICE			FULL PRICE			
	ADA ELIGIBLE	ADP	ADP%	ADA ELIGIBLE	ADP	ADP%	ADA ELIGIBLE	ADP	ADP%	
Lockhart High School	817	445	54.5%	165	85	51.5%	714	175	24.5%	41.6%
Lockhart Junior High School	838	460	54.9%	151	78	51.7%	463	129	27.9%	45.9%
Alma Brewer Strawn Elementary School	388	330	85.1%	60	48	80.0%	83	50	60.3%	80.6%

FIGURE 8–4 (CONTINUED)
LOCKHART ISD BREAKFAST AND LUNCH PARTICIPATION PERCENTAGES BY CATEGORY
OCTOBER 2017

CAMPUS	LUNCH									TOTAL ADP%
	FREE			REDUCED-PRICE			FULL PRICE			
	ADA ELIGIBLE	ADP	ADP%	ADA ELIGIBLE	ADP	ADP%	ADA ELIGIBLE	ADP	ADP%	
Bluebonnet Elementary School	817	134	16.4%	165	20	12.1%	714	46	6.4%	64.0%
Carver Early Education Center	817	134	16.4%	165	20	12.1%	714	46	6.4%	78.7%
Clear Fork Elementary School	817	134	16.4%	165	20	12.1%	714	46	6.4%	57.1%
Navarro Elementary School	817	134	16.4%	165	20	12.1%	714	46	6.4%	70.5%
Plum Creek Elementary School	817	134	16.4%	165	20	12.1%	714	46	6.4%	73.4%

NOTES: ADA=average daily attendance; ADP=average daily participation.

SOURCES: Lockhart ISD Elementary Schools Site Claim Reports; Lockhart Junior High School, and High School Site Claim Reports, October 2017.

determine the reasons students do not eat cafeteria meals and why there is significant plate waste among the students who do participate.

Low participation at the junior high and high schools may be due to students’ and parents’ perceptions of the food taste and quality. The review team observed significant plate waste during meal services. During onsite interviews, junior high and high school students said that they dislike cafeteria food and prefer to bring lunch from home. Principals indicated that although the menus contain healthy items, students discard a lot of food, and determining which foods students prefer would help participation. Food services staff indicated that participation is low at the high school because the campus is open during lunch and many students leave.

A survey conducted by the Legislative Budget Board (LBB) showed that only 29.9 percent of parents and 36.6 percent of Lockhart ISD campus staff agreed or strongly agreed with the statement “the cafeteria’s food looks and tastes good.” Parent survey results indicate that 47.3 percent of parents agreed with the statement “My student regularly purchases a meal from the cafeteria.”

Lockhart ISD’s contract with the FSMC may also impact student participation. The contract requires the FSMC to

“promote maximum participation in the Programs.” TDA requires school districts to use a standardized contract template. Districts may choose a cost-reimbursable or a fixed meal rate contract. Lockhart ISD’s contract is cost-reimbursable and the FSMC bills Lockhart ISD for food and labor costs and fixed administrative and management fees. Fluctuations in student participation do not impact the fees the district pays the FSMC to administer the CNP. In contrast, under a fixed meal rate contract, an FSMC charges a school district a fee for each meal prepared and served. With a fixed meal rate contract, the FSMC’s revenue is more directly connected to student participation.

If the FSMC does not maximize participation, there is a risk that students are not receiving the nutrition benefits made available through the CNP. According to the national organization Food Research and Action Center, studies conclude that participation in school breakfast is associated with improved math grades, attendance, and punctuality. Students who eat breakfast show improved cognitive function, attention, and memory. Research shows that children who eat breakfast at school, closer to class and test-taking time, perform better on standardized tests than those who skip breakfast or eat breakfast at home. They found that school breakfast participation is associated with a lower body

mass index (an indicator of excess body fat), lower probability of being overweight, and lower probability of obesity. Similarly, the NSLP has continued to grow as an integral part of the local education program. Educator comments, published on the USDA Food and Nutrition Service, further assert that children who do not eat properly are very hard to discipline. Conversely, students who receive a nutritious lunch have shown a marked improvement in attitude.

In addition, if participation is not maximized at the campus level, the district forgoes potential revenues from reimbursement claims for eligible students who are not participating. Lockhart ISD does not receive the full amount of potential federal and state revenues to support the food service operation.

Best practices dictate that the district remove barriers to student participation in the SBP and NSLP so that students receive the nutritional benefits of the child nutrition programs. To increase meal participation, effective food service departments prepare nutritious food that is appetizing and liked by students.

Alternative service models that move breakfast from the cafeteria and make it a part of the school day often increase breakfast participation. These models overcome timing, convenience, and stigma barriers that inhibit participation in school breakfast. Corrigan-Camden ISD successfully implemented Breakfast 2.5 to increase SBP participation at the high school. During Breakfast 2.5, students go through the cafeteria serving line and receive pre-packed bags that contain all the components of a reimbursable meal. Students take the bags to class and eat during the beginning of the class period. Breakfast 2.5 is popular with the students and has increased participation in the SBP with little to no class disruption.

Elgin ISD developed menus that not only meet the nutritional needs of students but are served as a marketing tool for the department to attract customers. Elgin ISD daily provides students and teachers with a variety of menu selections that include fresh fruits and healthy choices. The food is prepared and served in a comfortable atmosphere.

Del Valle ISD increased student participation in its CNP. These efforts included updating menus with new selections and establishing a new food court. The district increased its federal reimbursements and ensured that students received adequate nutrition as accorded by the NSLP and SBP.

Lockhart ISD should ensure that the food service management company promotes maximum participation in the Child Nutrition Programs. To accomplish this, the district should coordinate with the FSMC to do the following:

- Track daily participation for each menu to determine if certain menus are more appealing to students than others and make changes as indicated;
- Provide information about various promotions on the district's website and via brochures and menus provided to students and parents;
- Establish a menu planning team that may include students, school wellness team members, and other school staff;
- Revise menus based on feedback from surveys conducted of students, parents and staff. The FSMC should modify menus to incorporate foods that the students enjoy to increase the number of students who participate. The FSMC could involve the students in menu planning activities to increase student engagement; and
- Provide grab-and-go breakfasts: Breakfasts could be individually packaged and distributed from the cafeteria line, carts, or kiosks at other locations on the campus. Students could eat outside the cafeteria, in class, or in common areas, such as bus drop-off points, before or between classes; and
- Implement second-chance breakfast: Students could be allowed time after their first-period class for breakfast. Breakfast could be served from the cafeteria or carts in the hallway after first period, allowing students who arrive late or are not hungry first thing in the morning to receive a healthy breakfast.

Lockhart ISD should also evaluate the option of using a fixed meal rate contract during future considerations of contract proposals. The assistant superintendent of operations and technology and the chief financial officer should identify and compare the costs and benefits of each type of food service contract. This analysis could include a comparison of management and administration fees, fixed rate fees and performance incentives.

Since the time of the onsite review, staff indicated that the district has implemented some new strategies to build participation at all campuses. These strategies include the use

of student surveys, culinary education classes, health and wellness fairs and nutrition education classes.

If the district coordinates with the FSMC to implement some of the strategies identified, it could achieve a participation increase. **Figure 8–5** shows the projected daily gain if breakfast and lunch ADP at Lockhart High School were to increase to 30.0 percent and 65.0 percent.

As **Figure 8–5** shows, there is an opportunity to increase food services revenue at the high school by \$56.18 daily if ADP for breakfast increased to 30.0 percent and ADP for lunch participation increased to 65.0 percent.

The fiscal impact for this recommendation assumes any strategies to increase participation could be implemented using existing resources and that CNP participation and revenue would increase. If the district increased breakfast participation to 30.0 percent of ADP at the high school, and

increased lunch participation to 65.0 percent of ADP at the high school, the total projected annual revenue would increase by approximately \$9,662.96 annually (\$56.18 daily increase in revenue x 172 days in a school year), rounded to \$9,663.

The potential fiscal impact to shift from the current cost-reimbursable contract to a fixed meal rate contract cannot be determined until the assistant superintendent of operations and technology develops an analysis of both methods.

OFFER VERSUS SERVE (REC. 25)

Lockhart ISD food services staff do not consistently ensure that students select meals that comply with the Offer versus Serve provision of the federal National School Lunch and School Breakfast Programs.

According to director of food and nutrition services, Lockhart ISD has implemented OVS at all grade levels with the

**FIGURE 8–5
LOCKHART HIGH SCHOOL ACTUAL VERSUS PROJECTED REVENUE FOR BREAKFAST AND LUNCH WHEN AVERAGE DAILY PARTICIPATION (ADP) INCREASES TO 30.0 PERCENT FOR BREAKFAST AND 65.0 PERCENT FOR LUNCH
SCHOOL YEAR 2017–18**

BREAKFAST							
CATEGORY	ADP AT 11.8% OF ENROLLMENT				PROJECTED 30.0% ADP		
	APPROVED	ADP	REVENUE PER MEAL	TOTAL REVENUE	30.0% ADP	TOTAL REVENUE	INCREASED DAILY REVENUE
Free	817	134	\$2.09	\$280.06	245	\$512.05	\$231.99
Reduced- Price	165	20	\$1.79	\$35.80	50	\$89.50	\$53.70
Full Price	714	46	\$0.30	\$13.80	214	\$64.20	\$50.40
Total	1,696	200		\$329.66	509	\$665.75	\$336.09
LUNCH							
CATEGORY	ADP AT 41.6% OF ENROLLMENT				PROJECTED 65.0% ADP		
	APPROVED	ADP	REVENUE PER MEAL	TOTAL REVENUE	65.0% ADP	TOTAL REVENUE	INCREASED DAILY REVENUE
Free	817	445	\$3.31	\$1,472.95	531	\$1,757.61	\$284.66
Reduced-Price	165	85	\$2.91	\$247.35	107	\$311.37	\$64.02
Full Price	714	175	\$0.39	\$68.25	464	\$180.96	\$112.71
Total	1,696	705		\$1788.55	1,102	\$2,249.94	\$461.39
Total Breakfast and Lunch Revenue							\$2,915.69
Total Breakfast and Lunch Increased Daily Revenue							\$797.48
Total Increase in Meals Served							706
Total Breakfast and Lunch Increased Daily Costs (1)							\$741.30
Net Breakfast and Lunch Increased Daily Revenue							\$56.18

NOTE (1): Total cost for increase participation was calculated by multiplying the total increase in meals served by the 2016-17 cost per meal calculation of \$1.05.

SOURCES: Lockhart High School National School Lunch Program Site Claim Report October 2017; National School Lunch Program Claim Rates; Legislative Budget Board School Performance Review Team, November 2017.

exception of pre-kindergarten students at Carver Early Education Center and Alma Brewer Strawn Elementary School. OVS is a serving method designed to permit students to choose foods they want and reduce food waste without jeopardizing the nutritional integrity of the meals served. OVS allows students to decline some of the food offered in a reimbursable lunch or breakfast.

For the purposes of OVS at breakfast, a cafeteria must offer at least four food items from the three required food components, which are fruit, grains, and milk. A student must select three food items, including at least one-half cup of fruit to have a reimbursable breakfast. A student could refuse one of the breakfast items (except one half-cup of fruit) and still have selected a reimbursable meal. For OVS at lunch, a cafeteria must offer food items from the five food components, which are meat/meat alternates, grain, fruits, vegetables, and milk. A student must select three of the five offered components. One of the choices selected must be at least a one-half-cup serving of a fruit or vegetable item or a one-half-cup total serving of both fruit and vegetable. Meals with less than one-half cup of fruits or vegetables are not reimbursable. For both breakfast and lunch, if a student is required to select all components, the cafeteria is not implementing OVS.

During the onsite review, the review team observed that food services staff did not consistently ensure that students selected enough fruit and vegetables for their meals to qualify for reimbursement under OVS. For example, at the high school, the review team observed cashiers count several breakfasts that were missing fruit. Similarly, at the junior high school, the review team observed students selecting incomplete meals that were missing required components. Examples of meals observed included tacos and rice with no fruit or vegetable selected and hot dogs and rice with no fruit or vegetable selected.

In addition to claiming meals that did not contain enough of the required components, cashiers required students to take additional food even if they already had a reimbursable meal. For example, at the high school breakfast observation, cashiers asked several students with trays of pancakes and juice to take another item, even though pancakes and juice already comprise a reimbursable meal. During the junior high school lunch observation, cashiers sent students back to the serving line to get additional items, even though these students had already selected a reimbursable meal containing an entrée and a vegetable. The cashiers' inconsistent

identification of reimbursable meals indicate a lack of training on meal pattern requirements.

Meals that contain fewer than three different food components are not reimbursable. During an AR, TDA could disallow or reclaim meals with less than one-half cup of fruits or vegetables. If errors are identified, TDA may identify corrective action and provide technical assistance as needed.

According to Lockhart ISD's contract with the FSMC, the school district is "responsible for the conduct of the Food Services Department and shall supervise the food service operations in such manner as will ensure compliance with all applicable statutes, regulations, rules and policies including regulations, rules, and policies of TDA and USDA." Therefore, Lockhart ISD is responsible for monitoring the FSMC to ensure the FSMC implements OVS in accordance with program regulations.

Lockhart ISD should monitor the food service management company to ensure that meals claimed for reimbursement comply with Offer versus Serve requirements for breakfast and lunch. To implement this recommendation, the assistant superintendent of operations and technology should:

- Visit the cafeterias weekly or monthly to review the OVS process and ensure that program requirements are met;
- Observe POS counts on each cafeteria line to ensure that students are not required to take unnecessary components that they do not intend to eat;
- Coordinate with the director of food and nutrition services to ensure that food is arranged on the serving line in a manner that makes it convenient for students to refuse food items. For example, menu items that are less likely to be consumed can be individually plated, rather than served on the tray;
- Educate students on what is included in school meals so that they know how to select a reimbursable meal;
- Verify that signage and menus provide clear information about allowable choices. This information would help students easily build a reimbursable meal and reduce problems at the point of service, such as students forgetting a required food item and having to go back and get it, which often slows down the serving line; and
- Train all staff who serve and count reimbursable meals to recognize a reimbursable meal in accordance

with the requirements of OVS. Each summer and often throughout the year, Regional Education Service Center XIII (Region 13) offers a variety of free workshops and training classes that explain OVS and meeting meal pattern requirements. Lockhart ISD food service staff should attend these workshop classes.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

- Lockhart ISD uses coded identification (ID) cards scanned at the POS to record meals served. The ID cards have alpha numeric codes instead of simple numeric codes, which does not allow for students to enter numbers into a keypad. As a result, if a

student does not have their ID card, or the card fails to scan properly, cashiers must manually look up the students’ ID number in the system, which causes slow lines, especially at the high school and the junior high school.

- The height of the serving lines at Clear Fork Elementary School and Plum Creek Elementary School makes it challenging for younger, smaller students to select food items.

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	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR	ONETIME
						(COSTS) OR SAVINGS	(COSTS) OR SAVINGS
CHAPTER 8. FOOD SERVICES							
23. Coordinate with the food service management company to ensure that teachers count and claim breakfasts for accurate reports of reimbursable meals in accordance with written procedures and federal regulations.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
24. Ensure that the food service management company promotes maximum participation in the Child Nutrition Programs.	\$9,663	\$9,663	\$9,663	\$9,663	\$9,663	\$48,315	\$0
25. Monitor the food service management company to ensure that meals claimed for reimbursement comply with Offer versus Serve requirements for breakfast and lunch.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$9,663	\$9,663	\$9,663	\$9,663	\$9,663	\$48,315	\$0

CHAPTER 9. TECHNOLOGY MANAGEMENT

An independent school district's technology management affects the operational, instructional, and financial functions of a school district. Technology management requires planning and budgeting, inventory control, technical infrastructures, application support, and purchasing. Managing technology is dependent on a district's organizational structure. Larger districts typically have staff dedicated to administrative or instructional technology responsibilities, and smaller districts may have staff responsible for both functions.

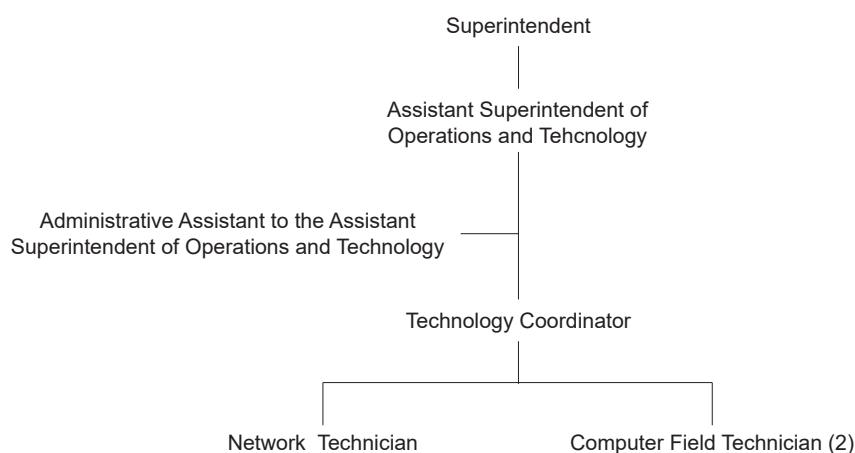
Administrative technology includes systems that support a district's operational, instructional, and financial functions (e.g., financial management, human resources, payroll, student attendance, grades, and Public Education Information Management System reporting). Administrative technology improves a district's operational efficiency through faster processing, increased access to information, integrated systems, and communication networks. Instructional technology includes the use of technology as a part of the teaching and learning process (e.g., integration of technology in the classroom, virtual learning, and electronic instructional materials). Instructional technology supports

curriculum delivery, classroom instruction, and student learning.

Lockhart Independent School District's (ISD) Technology Department manages the district's network, hardware, and software support needs. The Technology Department has five staff. The technology coordinator oversees the department and is also responsible for server maintenance, account maintenance, district firewall, all district Internet operating system (IOS) devices, and all district cellular phones. The technology coordinator reports to the assistant superintendent of operations and technology. The department also has a network technician who supports all network infrastructure, district security systems, cabling, and fiber networking. Additionally, the Technology Department has two computer field technicians who provide technical support to all 10 district campuses.

The administrative assistant to the assistant superintendent of operations and technology also supports the activities of the Technology Department. This position is responsible for password resets, maintaining ID badges for employee access to district facilities, and technology purchases. **Figure 9-1** shows the organization of the Technology Department.

FIGURE 9-1
LOCKHART ISD TECHNOLOGY DEPARTMENT ORGANIZATION
SCHOOL YEAR 2017-18



SOURCES: Lockhart ISD, November 2017; Legislative Budget Board, School Review Team, November 2017.

Lockhart ISD also has staff in other departments with duties related to technology. The district has four technology instructional mentors (TIM) that report to the assistant superintendent of curriculum and instruction. The TIMs oversee instructional technology throughout the district. The district also has a Public Education Information Management System (PEIMS) coordinator. The Legislative Budget Board’s School Performance Review Team visited the district in November 2017. At the time of the onsite review, the PEIMS coordinator reported to the executive director of student programs. Since the time of the review, the district moved this position to report to the deputy superintendent. The PEIMS coordinator oversees the collection, integration, and formatting of all data required for submission to the Texas Education Agency (TEA), in accordance with PEIMS data standards. The PEIMS coordinator’s responsibilities include editing and verifying data for accuracy, execution, and distribution of various reports to appropriate staff. Responsibilities also include collaborating and assisting campus PEIMS clerks.

The district’s website management and updates are a shared responsibility of campus staff, department staff, and individual teachers. The public information officer updates the district’s main webpage as needed.

The district provides wireless access to the Internet on all campuses. The district maintains two firewall systems. The

district purchased one firewall system from a network security company, and it obtained the other system from Regional Education Center XIII (Region 13). In addition to the firewall systems, the district implemented Active Directory, a Microsoft software that authenticates and authorizes all users and computers in a Windows domain network. The system assigns and enforces security policies for all computers and for installing or updating software. The district also has implemented a voiceover Internet protocol (VOIP) phone system, which enables district staff to make calls using an existing data network.

Lockhart ISD operates a wide area network on a fiber-optic structure that provides a 10 gigabit connection to all district locations. All campuses have wireless connectivity that provides flexible access to the Internet. All district locations have a local area network to provide connectivity for local hardware devices. The networking infrastructure includes 10 physical servers and 30 virtual servers. The district installed several system software applications to provide such services as database management, e-mail, antivirus, security, and content filtering.

Figure 9–2 shows the number of computers (desktops, laptops, and tablets) available to students at each campus.

Figure 9–3 shows a summary of Lockhart ISD’s technology budget for school year 2016–17.

**FIGURE 9–2
LOCKHART ISD COMPUTERS PER CAMPUS (1)
SCHOOL YEAR 2017–18**

CAMPUS	DESKTOPS	LAPTOPS	TABLETS	CHROMEBOOKS	TOTAL DEVICES	STUDENTS
Carver Early Education Center	64	52	85	0	201	212
Bluebonnet Elementary School	201	61	68	98	428	663
Clear Fork Elementary School	184	25	40	38	287	488
Plum Creek Elementary School	201	44	75	87	407	550
Navarro Elementary School	157	37	27	52	273	457
Alma Brewer Strawn Elementary School	50	38	67	120	275	454
Lockhart Junior High School	280	153	17	231	681	1,292
Lockhart High School	500	380	30	240	1,150	1,523
Pride High School	27	27	0	30	84	22

NOTE (1): Computers include those that students use to perform assignments and complete academic testing.
SOURCES: Texas Education Agency, Texas Academic Performance Report, school year 2016–17; Lockhart ISD, 2018.

**FIGURE 9–3
LOCKHART ISD TECHNOLOGY BUDGET
SCHOOL YEAR 2016–17**

CATEGORY	AMOUNT
Staff Salaries and Benefits	\$560,717
Licensing	\$487,363
Supplies and Equipment	\$429,326
Capitalized Assets	\$246,320
Technology Infrastructure	\$73,353
Travel	\$8,094
Total Budget	\$1,805,173
Total Students	5,661
Average Expenditure Per Student	\$319

SOURCE: Lockhart ISD, Technology Budget Report, school year 2016–17.

Lockhart ISD maintains an online work-order system for staff to request technical assistance. The system assesses the problem and assigns the work order to individual Technology Department staff. The system enables users and Technology Department staff to track open tickets and receive confirmation when a work order is closed. The system also enables the technology coordinator and the assistant superintendent of operations and technology to generate reports to assess the department’s efficiency and to determine the district’s continuing technology issues.

ACCOMPLISHMENT

- ◆ Lockhart ISD upgraded the district’s technology infrastructure to provide a more robust and technology-rich environment for teachers, staff, and students.

FINDINGS

- ◆ Lockhart ISD’s Technology Department lacks an organizational structure to provide the most efficient and effective technology support.
- ◆ Lockhart ISD lacks a process to ensure that the district has an updated, comprehensive technology plan that is based on identified needs and goals.
- ◆ Lockhart ISD’s Technology Department lacks documented procedures to guide the implementation of technology-related responsibilities.

RECOMMENDATIONS

- ◆ **Recommendation 26:** Revise the technology coordinator’s job description to include director-level duties and ensure that all staff are aware of the Technology Department structure.
- ◆ **Recommendation 27:** Develop and implement a comprehensive technology-planning process.
- ◆ **Recommendation 28:** Develop technology-related standard operating procedures and communicate procedures to all Technology Department staff.

DETAILED ACCOMPLISHMENT

INFRASTRUCTURE

Lockhart ISD upgraded the district’s technology infrastructure to provide a more robust and technology-rich environment for teachers, staff, and students.

During school year 2014–15, the district began to restructure its Technology Department. District leadership acknowledged the porous state of technology in the district and started the process of upgrading district facilities and equipment. During the next three school years, Lockhart ISD made extensive improvements to its technology infrastructure. These upgrades were funded through the district’s general fund and through the federal E-Rate program. **Figure 9–4** shows the technology improvements that Lockhart ISD has made since May 2015.

During onsite interviews, the majority of Lockhart ISD staff acknowledged the technology improvements of the district. All staff interviewed indicated increased satisfaction with the district’s technology management during the last three school years.

DETAILED FINDINGS

DEPARTMENT ORGANIZATION (REC. 26)

Lockhart ISD’s Technology Department lacks an organizational structure to provide the most efficient and effective technology support.

The district developed the technology coordinator position in July 2017, and the staff in this position previously was the district’s network manager. Before school year 2017–18, the assistant superintendent of operations and technology oversaw Lockhart ISD’s Technology Department in an executive director of technology position.

FIGURE 9–4
LOCKHART ISD TECHNOLOGY IMPROVEMENTS
MAY 2015 TO SEPTEMBER 2017

CATEGORY	AS OF MAY 2015	AS OF SEPTEMBER 2017
Average age of computers	5 years	2 years
Mobile devices (1)	0	1,305
Computer operating system	Windows XP	Windows 7
District Internet speed	75.0 megabytes (MB)	1.0 gigabyte (GB)
Wide area network speed – campus-to-campus	100.0 MB	10.0 GB
Network storage	Local servers only	Virtual server technology with local and cloud server backup
Wireless access points	Limited wireless availability	Wireless capability throughout all campuses, including district softball, baseball, and football stadiums
Network security	Standard firewall with no ability to track who accessed the network or district devices	Multiple firewalls installed and implemented the Microsoft Active Directory system that authenticates and authorizes all users and devices within the network
Telephone and voicemail system	Nortel system (1995)	Voice over Internet protocol system that enables voicemails to be received as emails
Security cameras	Limited cameras with physical tape review	Increased cameras at every campus with online accessibility for administrators to all cameras
District records	Hard copies in files	Human resources records, student records, and accounts payable information are all electronic
Student emails	None	All students have email accounts with Google services

NOTE (1): Mobile devices refer to laptop and tablet computers.

SOURCES: Legislative Budget Board School Review Team, November 2017; Lockhart ISD, November 2017.

During onsite interviews, the assistant superintendent of operations and technology indicated that the district slowly was transferring the management responsibilities of the Technology Department from his position to the technology coordinator. However, at the time of the onsite review, the roles and responsibilities of the assistant superintendent of operations and technology and the technology coordinator were not defined clearly. This lack of definition has led to some confusion among Technology Department staff.

For example, when interviewed, the network technician and the two computer field technicians all indicated that they report to both the assistant superintendent of operations and technology and the technology coordinator. None of the three positions were clear on exactly who to report to with daily questions and concerns; as a result, they approach whoever is available at a given time. Additionally, none of the three positions knew who would evaluate them officially at the end of the school year. During onsite interviews, the technology coordinator indicated that he was unclear if he or

the assistant superintendent of operations and technology would evaluate Technology Department staff.

Additionally, onsite interviews indicated that district and campus staff are not aware of the organizational structure of the Technology Department. For example, the Technology Department maintains an online work-order system. However, during onsite interviews, some Lockhart ISD staff indicated that, when technical issues arise, they bypass the online system and contact the Technology Department directly. In particular, staff indicated that they typically contact the assistant superintendent of operations and technology directly for assistance. Most staff interviewed perceived the assistant superintendent as responsible for the district's daily technology needs, and they call or email him with any technology questions or concerns. Very few Lockhart ISD staff outside the Technology Department were aware of the existence of the technology coordinator position or its role within the department.

The lack of clarity in the organizational structure of the Technology Department could result in communication breakdowns among Technology Department staff. When staff perceive that they report to two different positions, the risk increases that staff receive contradictory messages from department leadership. Additionally, communication breakdowns may occur when some staff report questions and concerns to the assistant superintendent of operations and technology and other staff report such information to the technology coordinator.

Figure 9–5 shows the job description of the technology coordinator compared to the job description of the executive

director of technology position that previously managed the Technology Department.

As shown in Figure 9–5, the technology coordinator job description includes very few of the duties of the executive director of technology position that previously managed the department. As a result, the assistant superintendent of operations and technology continues to conduct the director-level duties of the Technology Department that he previously performed in the executive director of technology position. In addition to Lockhart ISD’s Technology Department, the assistant superintendent of operations and technology also oversees the district’s Maintenance Department, and oversees

FIGURE 9–5
JOB DESCRIPTION COMPARISON – TECHNOLOGY COORDINATOR AND EXECUTIVE DIRECTOR OF TECHNOLOGY
SEPTEMBER 2017

TECHNOLOGY COORDINATOR JOB DUTIES	EXECUTIVE DIRECTOR OF TECHNOLOGY JOB DUTIES
Coordinate acquisition and installation of network devices at the district level.	Analyze complex business needs presented by schools and administrative departments, and develop and implement technical solutions. Explain technology solutions to senior management through presentation and advocacy.
Act as a liaison between district and information vendors and developers	Manage, direct, and assign priorities and personnel to major projects to ensure attainment of district and department goals and objectives
Maintain existing district phone system and provide planning and support for expansion and upgrades	Develop and implement district standards and specifications for hardware and software use, and computer networking
Install and maintain local-area and wide-area networking equipment, workstations, and servers	Devise, develop, implement, and maintain systems of internal controls, emergency and backup procedures, proper licensing, system upgrades, and disaster recovery plans to ensure integrity of information, security of databases, and internal network access control
Establish district hardware and software standards	Oversee support between the education service center and district staff, including programming, application support, and end-user support
Provide integration of network features and software applications	Implement the policies established by federal and state law, State Board of Education rule, and local board policy in the area of information management and technology
Stay informed of and comply with state, federal, and district policies	Compile, maintain, and file all reports, records, and other documents as required
Maintain district Internet content filtering system	Participate in the research of and application for technology-related grants or revenue sources
Maintain the district’s security camera system and ensure that it’s online at all times	Develop and administer the information technology budget based on documented needs, and ensure that operations are cost-effective and that funds are managed wisely
Monitor network devices by keeping logs and maintain all online systems	Coordinate the purchase of all computer hardware, software, and supplies; initiate purchase orders and bids in accordance with budgetary limitations and district policies
Maintain district’s inventory of all network and computer devices	Prepare, review, and revise technology department job descriptions
Maintain district servers, active directory and data storage	Select, train, supervise, and evaluate staff, and make recommendations relative to assignment, retention, discipline, and dismissal
Maintain usernames and students’ usernames	Supervise, evaluate, and recommend the hiring and dismissing of Technology Department staff
Manage and monitor the network technician and two field technicians	

SOURCES: Legislative Budget Board School Review Team, November 2017; Lockhart ISD, November 2017.

the contractors for the Food Services Department and the Transportation Department. The district's director of maintenance manages the Maintenance Department. The district contracts with vendors to operate the district's Food Services and Transportation departments. The director of food and nutrition services, who is employed by a contracted vendor, manages the daily operations of the Food Services Department. Another contracted vendor, the transportation management company general manager, manages the Transportation Department. Of the departments within the supervision of the assistant superintendent of operations and technology, the Technology Department is the only one managed by a coordinator and not a director or a manager.

Considering the assistant superintendent's responsibilities, it is challenging to effectively supervise all of these functional areas while also maintaining control of many of the daily operations of the Technology Department. Serving as the primary contact for many of the technology questions and concerns of Lockhart ISD's administrative and campus staff diminishes the amount of time the assistant superintendent has to ensure that the district's other operational areas operate effectively and efficiently.

Lockhart ISD should revise the technology coordinator's job description to include director-level duties and ensure that all staff are aware of the Technology Department structure.

The assistant superintendent of operations and technology should examine the director-level duties associated with managing the Technology Department and determine which duties are not assigned to the technology coordinator. The assistant superintendent of operations and technology should then determine which of these duties can be moved appropriately to the technology coordinator position. As a starting point, the assistant superintendent of operations and technology should examine which director-level duties are assigned to the director of maintenance. The assistant superintendent of operations and technology should make the job duties of the technology coordinator position consistent with the job duties of this director position. After the assistant superintendent of operations and technology revises the job description, the assistant superintendent of operations and technology should submit it to the superintendent and the Board of Trustees for approval. Since the time of the review, the district indicated that the technology coordinator has assumed all the responsibilities of the technology department and that the technology staff are aware the technology coordinator is their immediate supervisor.

The district also should inform staff of the structure of the Technology Department and continue to direct staff to use the online work-order system for technology issues. The assistant superintendent of operations and technology also should redirect all staff who contact him regarding daily technology issues to the technology coordinator or other Technology Department staff.

No fiscal impact is assumed for this recommendation. The district should align the increase in job duties with the salary of the technology coordinator. The average salary of a director position at Lockhart ISD, using school year 2017–18 salaries plus stipends, was \$85,549; the salary of the technology coordinator position was \$70,169. Lockhart ISD also should determine if the increase in job duties would require a change in the title of the position for the technology coordinator.

TECHNOLOGY PLANNING (REC. 27)

Lockhart ISD lacks a process to ensure that the district has an updated, comprehensive technology plan that is based on identified needs and goals.

School districts develop technology plans to assess and evaluate their technology status; determine areas of need; set goals, objectives, and strategies to meet those needs; and estimate the cost of achieving objectives. However, Lockhart ISD lacks a written technology plan to guide the district's technology decision-making process.

Before fiscal year 2015, all independent school districts and charter schools were required to develop and submit a long-range technology plan to be eligible for federal E-rate funding. E-rate is a program that provides discounts of up to 90.0 percent to help eligible schools and libraries in the U.S. obtain affordable telecommunications and Internet access. However, the E-rate program no longer requires school district technology plans. Thus, Lockhart ISD stopped producing a technology plan when this requirement for funding was removed. The last technology plan the district produced was in June 2012.

TEA provides a list of the recommended components of an effective technology plan. These components include the following:

- a needs assessment;
- goals, objectives, and strategies; and
- a budget.

Although Lockhart ISD does not engage in a formal technology-planning process, the district is completing some of these recommended components.

NEEDS ASSESSMENT

A needs assessment is a process that enables a district to determine what elements are in place for the use of technology in the district and to determine what technology needs must be implemented. Lockhart ISD conducted a technology needs assessment in January 2017. This assessment included a survey that the district sent to all teachers. The survey asked several questions regarding the integration of technology in the classroom and what technology teachers would like to see in an ideal classroom. The primary focus of the survey was not to analyze the overall technology needs of the district but to determine the best approach to incorporate instructional technology in the classroom.

In contrast, Lockhart ISD’s school year 2012–13 technology plan included a more comprehensive needs assessment that consisted of online surveys of teachers, parents, and students; interviews with district and campus administrators; and accumulation of data from the Texas School Technology and Readiness (STaR) Chart. The STaR chart is an in-depth questionnaire that documents how teachers and administrators perceive the district’s progress in providing successful digital learning environments for students and educators. The STaR chart is used to assess a district’s technology needs. Lockhart ISD has not conducted a STaR chart analysis since school year 2014–15. During onsite

interviews, Lockhart ISD staff were uncertain if the district will conduct a technology needs assessment during school year 2017–18.

GOALS, OBJECTIVES, AND STRATEGIES

The next step in successful technology planning is developing goals, objectives, and strategies that meet the district’s needs identified in the assessment. **Figure 9–6** shows an example of a technology plan with goals, objectives, and strategies.

Figure 9–6 shows an established goal to improve technology integration throughout the district, and various objectives that need to be met to accomplish the goal. Additionally, each objective has strategies that will be used to reach the objective. Each strategy also includes a detailed timeline for accomplishment, the staff in the district who will work on the strategy, and the evidence the district will use to determine if the strategy has been met. Using this process helps lay the foundation for effective planning and decision making and guides a district toward achieving its stated technology goals.

During onsite interviews, Lockhart ISD’s leadership described various ongoing technology goals of the district and the Technology Department. However, these goals were not always consistent nor were they accompanied by any strategies or methods for achievement. Technology Department staff could not describe the long-term goals of the department or the overall technology goals of the district.

**FIGURE 9–6
EXCERPT FROM LOCKHART ISD’S TECHNOLOGY PLAN,
JUNE 2012**

GOAL 1 – TEACHING AND LEARNING

Improve technology integration in teaching and learning in all Lockhart Independent School District classrooms and libraries to support student achievement.

OBJECTIVE 1.1

All educators will continue to identify, prioritize, and incorporate the use of Technology Application Texas Essential Knowledge and Skills (TEKS) to achieve learning objectives across the curriculum areas and grade levels.

STRATEGIES	TIMELINE	PERSON(S) RESPONSIBLE	EVIDENCE
Employ instructional strategies that address multiple learning needs and styles of all students through the use of technology.	Fall 2012 to Spring 2015	Teachers, Technology Curriculum Instructional Mentors, Principals	Video streaming, projectors, smart boards, digital cameras, Compass/ Odyssey software, Inspiration software, Study Island, state-adopted materials, and data analysis of benchmark testing
Students will evaluate the credibility, accuracy, relevance, and authority of all information sources.	Fall 2012 to Spring 2015	Teachers, Technology Curriculum Instructional Mentors, Librarians	Web-based Information Evaluation Training, Student Portfolios, Library Lessons

SOURCE: Lockhart ISD, Technology Plan, 2012 to 2015.

BUDGET

Effective technology planning also involves allocating funds to meet the district's established goals and objectives. Successful technology departments develop a budgeting process that establishes a distinctive budget model and guidelines for districtwide technology spending.

During onsite interviews, Lockhart ISD staff indicated that, each December, the Business and Finance Department distributes a budget worksheet to each department. The worksheet shows budget codes and identifies the amount of department spending to date during the current school year. The worksheet also enables department heads to request funding for the following fiscal year, which begins August 1. The assistant superintendent of operations and technology completes the budget worksheet for the Technology Department. The Technology Department budget allocations are not linked to any long-term department goals or a formal assessment of the district's technology needs. As a result, staff indicated that the technology budget typically is based on the funding the department received for the previous year.

Without a comprehensive technology-planning process, the district is unable to accurately assess its technology needs and risks not being able to strategically implement technology across the campuses. For example, during onsite interviews, Lockhart ISD staff indicated that the district has no formal process for determining when to replace computers and equipment. The assistant superintendent of operations and technology simply uses his best judgement. The decisions are not based on a formal assessment of technology needs or as part of a comprehensive, long-term, equipment-replacement plan.

Effective school districts develop technology plans that include goals, action plans, timelines, performance measures, success factors, and financial requirements and allocations. These plans identify designated staff responsible for a specific goal or strategy and for managing its implementation. Other Texas school districts such as Canutillo ISD, Florence ISD, and Magnolia ISD publish their technology plans on their respective district websites. These districts have produced plans that have the TEA-recommended components, including an introduction, needs assessment, goals, objectives, strategies, budget, evaluation, and appendix. Katy ISD has formalized its needs assessment process by conducting an extensive technology assessment for each campus and administrative department, using internal and external assessments, and aligning the results to district goals and objectives.

Lockhart ISD should develop and implement a comprehensive technology-planning process.

The district should begin by establishing a technology committee to develop the technology plan. The committee membership should include two teachers from each campus, the technology coordinator, the assistant superintendent of operations and technology, the CFO, the assistant superintendent of curriculum and instruction, and selected librarians, TIMs, and community representatives. The technology committee should meet regularly during the development of the plan.

The technology committee should do the following to complete the technology-planning process:

- Develop and conduct a needs assessment. Lockhart ISD should develop or use an existing survey tool that analyzes the current technology status and needs of the district. Information could be gathered using the Texas STaR Charts (campus and teacher) or other measurement tools for technology implementation such as those already developed by other districts;
- Develop a three-year technology plan. The plan should include measurable goals, objectives, and strategies. The technology committee should use the needs assessment as a basis for developing the goals in the plan. The committee also should ensure that all technology goals align with those in Lockhart ISD's district improvement plan and campus improvement plans. Additionally, each goal in the technology plan should include an estimated cost and potential funding source. The district should base the Technology Department budget on estimated totals of all the goals in the technology plan. When the plan is complete, the committee should send the plan to the superintendent and Board of Trustees for approval. TEA has several resources the committee can use to develop the district's technology plan; and
- Develop a process to monitor and evaluate the progress of the technology plan. This evaluation process should include the methods used to evaluate the plan, how frequently the plan will be evaluated and updated, who is responsible for evaluating and updating the plan, and how the finding of the evaluation will be communicated and distributed. The technology committee should provide a report to the superintendent and the board after each formal evaluation occurs.

The district could implement this recommendation with existing resources.

DEPARTMENTAL PROCEDURES (REC. 28)

Lockhart ISD's Technology Department lacks documented procedures to guide the implementation of technology-related responsibilities.

During onsite interviews, Technology Department staff indicated that they follow established practices for the daily operation of the department, but no standard operating procedures (SOP) are in place for these activities. SOPs are a compiled set of step-by-step instructions that act as guidelines for staff work processes. SOPs promote consistency in the performance of processes and tasks. Without SOPs, the Lockhart ISD Technology Department relies solely on the knowledge and expertise of staff who have held their positions for several years.

For example, no SOP is in place for technology asset management. Technology purchases made by district and campus staff are shipped to the Technology Department. Technology Department staff tag and apply bar codes to large devices and equipment such as computers, monitors, and projectors. The Technology Department tracks all tagged equipment through an inventory management software system. Equipment is then delivered to the campuses, and either the librarian or the TIMs distribute the devices to the teachers. The TIMs and librarians also apply bar codes to some equipment when it is delivered to the campuses. This equipment includes items such as cables, computer mice, and keyboards. These items also are tracked through the inventory management system and stored at the campus. The Technology Department does not conduct any physical inventories of equipment. Campuses conduct their own inventories. Lockhart ISD has no written procedures that identify what items the Technology Department should tag. Technology Department staff use their discretion to decide what items to tag and track. Additionally, each campus decides which items to track, and this practice is not consistent across campuses.

During the review team's walk-throughs of campus facilities, the team observed that the majority of equipment had bar codes or asset tags, but several pieces of equipment, including some PCUs and monitors, did not have tags. These items may not have tags if they are older and were purchased before the tracking process was established. However, without written guidelines and procedures, the reason for the lack of tags is difficult to determine. These inconsistencies in tagging

and tracking equipment increase the chance of assets being misplaced or of the district purchasing equipment that it already owns.

SOPs also protect the district from loss of information in the event of staff turnover and facilitate effective assimilation of new staff into the department's operations. For example, in August 2017, the Technology Department filled the vacant computer field technician position. The majority of the computer technician's duties include responding to the work-order requests by campus staff for technical assistance with equipment technology infrastructure. The Technology Department, however, did not provide this new staff with any written procedures or overview of the work he would perform. Instead, he shadowed the veteran technician for several days until he was given his own assignments.

This process can become problematic in a small department such as the Technology Department. The department has one other computer field technician, and if he is absent for an extended time or is no longer employed in the district, the department risks the continuity from that position's institutional knowledge. The lack of SOPs would leave the department with one new staff that has limited experience to implement the computer technician duties or to train new staff.

Without documented procedures, staff may perform functions in an inconsistent and inefficient manner. The absence of written guidance leaves decision making and problem solving to the discretion of Technology Department staff. Each staff may approach a similar situation differently, which could result in inconsistencies and reduce effectiveness and efficiency. Additionally, a lack of documented procedures leaves the district unprepared for emergencies and other issues that can occur.

Documented procedures assist with streamlining daily operations and troubleshooting nonroutine problems. In addition, written procedures enhance the efficiency and overall effectiveness of the technical staff in managing the district's technology-related needs. Mexia ISD uses a Technology Procedures Manual as a handbook for technology requests, user accounts, guest accounts, technology-purchasing procedures, and supply items. Fabens ISD has posted its SOP manual on the district website. The SOP document contains email guidelines, help desk information, asset inventory management guidelines, equipment repurposing guidelines, equipment checkout guidelines, and hardware and software purchasing guidelines. Humble ISD

has a technology management plan that provides descriptions of personnel and processes, including its planning process, acquisition review committee, instructional technology, network administration, and network and desktop support.

Lockhart ISD should develop technology-related standard operating procedures and communicate procedures to all Technology Department staff. The Technology Department should identify technology functions and activities that require procedures, guidelines, or standards. As procedures are developed and approved by the assistant superintendent of operations and technology, they should then be distributed to all Technology Department staff. The district should review and update all technology SOPs annually.

The district could implement this recommendation with existing resources.

ADDITIONAL OBSERVATIONS

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

- Lockhart ISD has demonstrated a commitment to technology through its investment in updated

technological tools to enhance classroom effectiveness. During January 2017, Lockhart ISD developed the Visionary Instructional Planning (VIP) program. The VIP program’s primary goal is to install technologically updated classrooms throughout the district.

- Lockhart ISD has developed a technology disaster recovery plan. During onsite interviews, however, Technology Department staff were not familiar with the plan and had not received copies of the plan.

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	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONETIME (COSTS) OR SAVINGS
CHAPTER 9. TECHNOLOGY MANAGEMENT							
26. Revise the technology coordinator’s job description to include director-level duties and ensure that all staff are aware of the Technology Department structure.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
27. Develop and implement a comprehensive technology-planning process.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
28. Develop technology-related standard operating procedures and communicate procedures to all Technology Department staff.	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0