Waco Independent School District

LEGISLATIVE BUDGET BOARD STAFF AND

GIBSON CONSULTING GROUP, INC

MAY 2012

Waco Independent School District

Legislative Budget Board Staff and
Gibson Consulting Group, Inc.

May 2012

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LEGISLATIVE BUDGET BOARD

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May 29, 2012

Dr. Bonny Cain
Superintendent
Waco Independent School District

Dear Dr. Cain:

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

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

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

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

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

Respectfully submitted,

Ursula Parks
Acting Director
Legislative Budget Board

cc: Mr. Pat Atkins
Mr. Allen Sykes
Ms. Angela Tekell
Mr. Larry Perez
Mr. Norman Manning
Mr. Alex Williams
Mr. Cary DuPuy

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EXECUTIVE SUMMARY

Waco Independent School District's (WISD) school performance review notes 15 commendable practices and makes 60 recommendations for improvement. This Executive Summary highlights the district's significant accomplishments and recommendations. A copy of the full report is available at www.lbb.state.tx.us.

SIGNIFICANT ACCOMPLISHMENTS

- WISD supports job-embedded professional development for teachers through a cadre of district content specialists in the areas of core academic content, Bilingual/English as Second Language (BIL/ESL), Response to Intervention (RtI), advanced academics, and instructional technology. Job-embedded professional development is school or classroom-based and is integrated into teachers' workdays. It is focused on specific problems of practice, such as learning to teach a new curriculum or program or making modifications in instruction or materials to meet specific students' needs. The district's content specialists serve as a bridge from central office to the schools, disseminating information to staff who work in each area, and also providing an additional layer of oversight that central office directors typically would not have the resources to provide. District leadership is sending a clear message that WISD is committed to its improvement efforts and the success of its students by deploying a team of specialists to support teachers at the campus level.

- WISD has implemented changes to its Disciplinary Alternative Education Program (DAEP), and while it is still early, the results are promising with a significant reduction in recidivism in the DAEP. In developing the district's improvement plan, WISD included several performance objectives specific to improving student conduct. Goals for the program include improvements to classroom management techniques and reduction in the number of students returning with repeat violations. These goals have resulted in the development of a different program structure to serve the educational and behavioral needs of district students. In developing its new DAEP approach, principals visited several districts to get ideas and explore successful practices. The Waco Alternative Campus DAEP is developed around a system of positive and negative consequences for behavior. Students have to earn trust by showing they can manage behavior according to expectations. The school is staffed with a behavioral specialist and provides class time for discussing conflict resolution strategies, effective communication, and anger management. This action by the district resulted in a reduction in the repeat offenders from 46 percent in 2009–10 to only 13 percent in 2010–11. The reduction goal for 2011–12 is 6 percent.

- WISD has established effective partnerships with various organizations and leverages these relationships to reach out to parents and to the community. Two particular organizations provide strong support for WISD efforts to provide a quality education for its students: The Greater Waco Education Alliance and Parents for Public Schools–Waco Chapter. Both organizations have strong relationships with the school district's superintendent and with school board members, and are strongly engaged in improving educational opportunities in Waco. The district has developed community partners by charging the superintendent with intermingling with the community, meeting its leaders, and listening to their concerns. The district also prioritizes development of community partnerships with three staff whose duties include participation on community boards, outreach to the business community with potential partnership opportunities, and relationship management of current partnerships. By making development of community relationships an expectation for administrators and staff, WISD has strong partners in the community for improving educational opportunities.

- The WISD Human Resources (HR) Department initiated and completed a comprehensive job analysis project to update all of the paraprofessional job descriptions in the district. HR staff provided a job analysis questionnaire that was completed by each paraprofessional employee, then reviewed and signed by each employee's supervisor. The HR Department

staff, with support from the Texas Association of School Boards, has been reviewing each job analysis questionnaire and determining if the employee is classified correctly and placed on the correct salary scale. Job descriptions serve a very important function in an organization. Not only are they used during the hiring process to identify the appropriate knowledge, skills, and abilities of candidates for employment, an accurate job description can be a valuable resource for performance management by establishing an agreement between the employer and employee about what acceptable job performance should be. Additionally, job descriptions can be extremely helpful in identifying necessary training and development to bring an employee up to an acceptable level of performance.

- WISD initiated the Pack of Hope (PoH) to support the district's efforts in ensuring that students are fed over weekends and holidays. Led by the district's food service director with the support of the staff, and in coordination with McLennan County Hunger Coalition, the Food Planning Task Force under the Waco Chamber of Commerce, the Baylor-based Texas Hunger Coalition, and several local faith organizations, WISD began operating from the district's warehouse in the spring of 2010. PoH supplies participating school districts and their eligible students with backpacks filled with nutritious food to prevent hunger from Friday through Sunday while they are out of school. The children receiving the food are not overtly identified. Volunteers inconspicuously give the backpacks to the recipient children who put them in their regular school backpacks to be taken home. Donations of food for the program have come from local vendors. After beginning with 30 backpacks for three WISD schools in 2010, the program has grown to serve 411 students in nine different districts.

SIGNIFICANT RECOMMENDATIONS

EDUCATIONAL SERVICE DELIVERY

- **Implement support structures at the central office level to address existing communication and culture issues and to strategically focus improvement efforts.** WISD does not have the appropriate organizational structures in place to support adequate educational services so that all students have the opportunity to succeed. Students in WISD exhibit a wide range of performance. In general, district performance is below state and regional averages and, at the campus level, performance varies greatly by school. Further, schools, as well as departments within central office, have historically acted in isolation, making autonomous decisions without effective communication. In restructuring the instructional services department, WISD leadership should work to implement a systems approach to the organization of the Curriculum, Instruction, and Assessment division that targets and prioritizes highest need areas and eliminates departmental isolation in supporting schools. As part of this effort, the district could consider organizing departments around support for vertical feeder patterns of schools. Clear lines of accountability should be drawn, and the district must ensure that key personnel are not overloaded and have support for doing their jobs. The redesign effort will provide a vehicle for establishing a common vision for teaching and learning in WISD; clear and efficient communication structures; engagement of all stakeholders to build buy-in; the equitable distribution of resources; and the commitment of school and district leaders to success for all students.

- **Develop and implement a plan to ensure that all staff understand and feel responsible for addressing the needs of students receiving special education services.** The administration of special education services is not aligned with the general education program, contributing to inaccurate identification of students for services, inappropriate testing, and exceedingly high discipline rates for special education students. WISD has a long history of concerns related to provision of special education services. Analysis of performance levels in the Performance Based Monitoring Analysis System (PBMAS) shows that, overall, the district does not provide adequate services to students, with a downward trend from year-to-year indicating a decline in services. Additionally, data indicated a significant disconnect between district staff—who realize the serious implications of the lack of compliance, and campus staff—who are charged with implementing the changes being made, and campus administrators—who expressed concern that there were not clear expectations and guidelines for providing special education services. The district should review and revise its plan to address students

receiving special education services, incorporating recommended processes from the National Center on Educational Restructuring and Inclusion. These processes should be incorporated into annual district and campus planning. Additionally, staffing of special education services should be examined to determine the most effective use of certified special education teachers and teaching assistants.

- **Identify a systems approach to early identification of high-risk students for dropping out, implement and monitor specific prevention interventions, and develop an aggressive recovery effort based on best practice standards.** The district does not have adequate systems in place for dropout prevention and recovery. WISD students (overall and in all student groups except limited English proficient students) are dropping out of school at a higher rate than state averages. The district is also significantly below state averages on other dropout-related Academic Excellence Indicator System (AEIS) indicators, such as Four-Year Completion Rate (Grades 9–12), Five-Year Extended Completion Rate (Grades 9–12), Completion Rate I, and Completion Rate II. Although the district provides flexible alternatives designed to improve the success rates of at-risk and recovered dropout students, these strategies are ineffective and should be reviewed and revamped to reflect research-based strategies in dropout prevention and recovery. The district should create three at-risk specialist positions that will have the following responsibilities: introducing proactive strategies such as developing and monitoring an early warning system, providing instructional interventions to students who are at-risk of dropping out and their teachers, and engaging the community in mentoring and outreach efforts. The total annual cost for creation of the three positions would be about $180,000.

- **Develop a multi-faceted approach to student misconduct that identifies and addresses operational impacts, distinguishes consequences for minor conduct infractions from penalties for major violations of law, creates consistency in intervention services, and provides for ongoing evaluation and implementation of successful programs that address obstacles to appropriate conduct.** WISD's behavior management approach lacks guidance on acceptable punishment, consistency in application of intervention programs, and assessment of operational factors affecting student conduct. These factors contribute to a high number of disciplinary referrals and removal of students from the optimum learning environment for minor infractions. Although WISD is addressing classroom management, the district has other factors which contribute to the higher level of disciplinary events. Application of discipline philosophy to individual behavior circumstances, programmatic consistency in intervention efforts, and enforcement staffing and deployment choices also affect district efforts to manage student behavior. Student disciplinary actions are affected by a district's philosophy on assigning consequences for misbehavior. Removal from the regular classroom as punishment for misbehavior removes students from teachers with subject matter expertise. The district provides behavior management and intervention services, but it is not consistent in how and how long programs are applied. Behavior programs provided at the individual school level may not continue as students move between schools. The district also staffs its schools with both police officers and security guards that have an impact on the discipline management, but when enforcement personnel is added to any organization, the number of violations may rise since more staff are identifying conduct violations. Collectively these issues may be contributing to the high number of reported student discipline violations. The district should provide guidance to staff on the implementation of discipline, evaluating successful behavior-based programs and developing a process for expanding them to meet the districts needs, as well as possibly reducing the number of security guards. Phasing out four security guard positions over a five year period could result in a total savings of approximately $362,000.

DISTRICT MANAGEMENT

- **Establish a site-based decision-making framework to delineate authority for WISD's central administration and schools and update the district's handbook accordingly.** The district does not have a site-based decision-making framework that defines decision authority between the central office and the schools and, as a result, decision authority is not consistently applied. The district provided the review team with a document entitled Campus

Decision Making Handbook prepared in 1999 as its guide to site-based decision-making. However, the document primarily focuses on how campuses should establish site-based decision-making teams, how team members should be selected, and how meetings should be held. Further review of the handbook shows that it is outdated and incomplete. The handbook provides general decision-making guidelines, but without specific instructions on function and responsibility, staff may not understand their decision-making authority and responsibility. Job descriptions for principals indicate that principals are responsible for managing instructional programs, service operations, and personnel at the campus level, and for providing leadership to ensure high standards of instructional services. Principals are also responsible for overseeing compliance with district policies, success of instructional programs, and operation of all campus activities. However, no guidelines exist in the job descriptions or any other district document to inform principals and central office staff what decisions lie within their respective authorities. Some decisions need to be made or guided centrally in order to provide consistent application and efficient operations at the schools and central administration. Other decisions, such as differentiation of instruction for individual students, can and should be made at the school level. Documentation and adoption of a single decision-making framework will help ensure that all principals and central administrators understand the ground rules for decision-making, and will ensure its consistent use.

- **Reinstate the internal audit function and have it report directly to the Board of Trustees.** WISD lacks an internal audit function to independently monitor and report compliance with policies, regulations, or laws to the board. The district vacated its internal audit function and created and funded a Systems and Controls coordinator (coordinator) position with the funds from the internal auditor position. Although there are some similarities in the job description for the two positions, there are some key differences. The coordinator position reports directly to the superintendent instead of the Board of Trustees. Primarily, an internal auditor's work is directed by a risk assessment that informs which functions in the organization are most at risk and helps to focus the auditor's efforts. In general, the job description for the coordinator includes being involved in operational activities and helping to implement change in the district. An internal auditor, due to requirements of independence, does not get involved with an organization's operations or in implementation assistance. Without an internal auditor function, the Board of Trustees may not regularly receive information about district operations that would allow them to make appropriate decisions for the district. The development of an internal audit function should begin with the establishment of a charter that defines the scope, responsibility, and authoritative guidelines of the function, and the district should budget $90,000 annually for the internal audit position (salary and benefits of $82,800 plus additional expenses of $7,200). In addition, the superintendent should consider eliminating the position of Systems and Controls coordinator within three years to allow for a reasonable time period for the coordinator to achieve the goals established by the superintendent for this position. Within three years when this position is transitioned out, the net fiscal impact will be an annual cost of $4,119.

- **Develop and implement a communications planning process that aligns messages and measurable strategies to ensure effective allocation of resources.** The district does not have a centralized communications plan that supports the district's strategic vision, outlining objectives and communication strategies that reach target audiences with the appropriate message. District messaging is more likely to be in reaction to an event than part of a developed campaign. As a result, the district risks not reaching all its constituencies with the desired information or with the most effective strategies. WISD should conduct periodic evaluations of currently used media as well as exploration of new media potential to reach new or underserved audiences. The district vision statement should be the foundation of district messaging, driving the communications plan and budget priorities. The communications plan should be a flexible tool for organizing, distributing, and tracking the success of the communication.

OPERATIONS

- **Develop staffing models for maintenance, custodial, and grounds staff.** WISD lacks established standards or methods for determining maintenance, custodial, and grounds staffing levels. The district did not provide the review team with any written or verbal staffing guidelines for decision-making for maintenance and grounds staffing. According to interviews, current staffing levels are based on historical staffing levels and WISD senior leadership's experience with school operations. The district should develop guidelines for its facilities staff. As part of the development process for staffing models, the district should use industry benchmark guidelines as a first step and then, if needed, refine staffing resources using an industry standard level of service model. A comparison of current staffing levels and workloads to industry benchmark standards indicates the district could reduce custodial staffing by up to 26 FTEs while still maintaining the same level of service. This reduction could be phased in over a period of time to allow the district to develop staffing models in school year 2012–13 and utilize attrition and retirement of custodial staff, which would result in an annual savings of around $459,680 per year.

- **Establish a transportation management position that will be responsible for the development of bus routes, contract compliance monitoring and performance management, in addition to transportation liaison responsibilities with school building administrators.** WISD lacks dedicated transportation expertise within the district's organization structure, with transportation management effectively absent. A transportation position exists on the organization chart under the senior director of Student Services, but there is no district employee filling this position. Rather, for all practical purposes, the contractor's Operations manager serves in this role. This position serves as the transportation liaison for the district's administrators, is tasked with the development and maintenance of bus routes, and manages all day-to-day transportation operations. However, there is a conflict that arises in making the contractor responsible for developing the bus routes that they will also operate. Having the district assume this responsibility leads to the most appropriate division of accountability whereby the contractor executes bus routes designed by the district. Establishing a transportation management position would allow the district to have oversight of contractor operations and an understanding relative to the transportation cost and service implications of programmatic and policy decisions. The total annual cost to the district for a transportation management position is about $92,000.

- **Implement a comprehensive bell time analysis, including consideration of the adoption of a three-tier bell schedule and reconfiguration that supports the development of efficient and effective transportation service delivery.** The current structure of school bell times places constraints on the ability of the Transportation Department to provide timely service and does not facilitate maximum transportation efficiency. WISD's transportation system has a two-tier system that is overly constrained by the bell time structure that fails to yield adequate levels of efficiency when compared to peer school districts. The district should implement a comprehensive bell time analysis. Should this preliminary analysis indicate that significant benefits are possible, an entirely new system of routes should then be developed within the routing software using student data and the prospective revised bell times in order to fully quantify the benefits and costs. Further, should the district be successful in rearranging bell times to a three-tier structure, it can expect the number of route buses required to be reduced by 30 percent and could anticipate savings of 20 percent or more of current costs, or approximately $740,000 annually, beginning in school year 2013–14.

- **Develop a comprehensive oversight plan to ensure that the district is in compliance with all state and federal regulations governing the Child Nutrition Program, and that program funds are maximized to deliver the highest affordable quality of food and service to students.** WISD does not have a comprehensive oversight plan to remain directly involved in, and closely monitor, the Child Nutrition Program (CNP) operations to ensure that the district is in compliance with all state and federal regulations, and to ensure program funds are maximized to deliver the highest affordable quality of food and service to district students. For the past 22 years, WISD has contracted with a food service management company (FSMC) to operate the CNP in the district. During

onsite review of the district's CNP, it was noted that WISD places significant reliance on the FSMC to oversee all aspects of the food service program. In an interview with district officials, it was stated that the district contracts with an FSMC for their expertise in the operation of the CNP, and that the district trusts that all required tasks are completed as necessary under the direction of the FSMC. However, WISD does not have any policies or procedures in place to ensure that the FSMC stays in compliance with all regulatory requirements. In developing an oversight plan, the district should analyze and validate all proposed expenditures prior to awarding or renewing the FSMC contract. In addition, WISD should create a checklist with a timeline indicating monitoring tasks to be accomplished in an effort to guide the activities of the FSMC and district food service employees, and to ensure compliance with program regulations and the delivery of quality food and service to students.

- **Develop strategies for increasing student participation in the School Breakfast Program.** WISD does not fully realize the nutritional value to students and the revenue available, as participation in the school breakfast program (SBP) is low at some campuses. Currently, the district operates a universal breakfast program districtwide. Universal school breakfast refers to any school program that offers breakfast at no charge to all students, regardless of income. Current average daily participation (ADP) rates for breakfast for all free, reduced-price, and full price students is 35.4 percent at the high schools, 50.4 percent at the middle schools, and 62.7 percent at the elementary schools. Suggested participation rates for WISD might be 60 percent at the high schools, 70 percent at the middle schools, and 80 percent at the elementary schools. Some of the strategies that WISD could use to increase student participation in the SBP include: expanding the practice of providing breakfast in the classroom, considering the potential for bringing students to the cafeteria in groups for a 15 minute nutrition break after the beginning of the school day but prior to 10:00 AM, and evaluating the potential for remote distribution stations which can increase breakfast participation in high schools, as long as the point of service system can accommodate each location. If the district could increase high school participation in the breakfast program to 60 percent; middle school to 70 percent; and elementary school to 80 percent, then profits could increase by $243,549 annually, or approximately $1.2 million over a five-year period.

- **Establish a technology planning committee comprising all stakeholder groups to develop a three-year long-range technology plan with the necessary components to make it a comprehensive and effective management tool.** WISD lacks an effective comprehensive long-range technology plan. Additionally, the technology plan that has been developed was not created by a planning committee representing all district stakeholders, and the plan does not address some needs such as computer allocation. WISD should establish a technology planning committee comprised of stakeholders including administrators, principals, teachers, students, and community members to develop a three-year long-range technology plan with the necessary components to make it a comprehensive and effective management tool. Development of the district's technology plan should include the following activities: expanding the technology plan committee membership to include principals, teachers, students, parents, and community members; reviewing funding and adjusting budgets; updating technology-related standards, policies, and procedures; reexamining the district improvement plan to determine how technology can support its defined goals and adjust strategies; and reviewing infrastructure upgrades to assist in achieving the state's recommended student-to-computer ratio of 1:1.

- **Develop a comprehensive disaster recovery plan.** Without a comprehensive disaster recovery plan, if a catastrophic event occurred—such as a hurricane, flood, fire or vandalism—the district's data would be at risk of loss. In addition to the data loss, the district would not be able to perform important functions, such as student information functions and key business functions, until the original systems were restored. During the planning process the district should classify applications and systems into categories, such as mission critical, critical, essential, and non-critical. These categories indicate how important the application or system is to the district's operation and whether or not the application or system functions can be performed manually. The district should then determine the desired restoration timeframe for each

category. The plan should also include emergency contacts for Technology Services Department staff, district administrators, and hardware and software vendors.

BUSINESS SERVICES

- **Integrate and automate the information systems for human resources, payroll, budgeting and finance to improve the reliability of data and reduce the time spent by district staff processing transactions and handling paper documentation**. WISD underutilizes its financial, payroll, and human resources information systems, resulting in extensive manual procedures and reconciliations to perform basic budgeting and accounting functions. The district uses multiple systems to capture and process data related to these functions. While each of these departments has a different mission, there is significant overlap in the data used by each department in carrying out that mission. The lack of integration and automation of these systems results in inefficient, manual data entry; increased probability of errors and/or incomplete data; additional staff time to print paper transactions or time sheets; additional effort spent keeping multiple information systems in sync; and a higher volume of paper documents routed through inter-office mail and subject to filing, storage, and records retention. For the implementation of this recommendation, WISD may require external support of an information technology consulting firm. The district has already budgeted funds for the upgrade of its existing financial system to the web-based version. However, automating the payroll process and implementing additional modules of eFinancePlus may require additional costs for programming support. The estimated cost for this support is around $150,000 for external consulting services over the next two fiscal years.

- **Fully develop and implement contract oversight procedures to ensure that all of the district's contracts are adequately monitored and negotiated, and that contracts are audited on a regular basis, with audit results reported to the Board of Trustees.** WISD does not have adequate oversight of contract monitoring from district personnel for some of its contracts. Without adequate monitoring, the district cannot be assured that all contracts and vendor performance are being overseen in a consistent and effective manner. This situation puts the district at risk of entering into contracts that may not be favorable to district interests. Although the district has contracting oversight in some areas, the review team identified two significant district contracts without sufficient monitoring from WISD personnel. The district has contracted with Sodexo for the past 22 years to operate its cafeterias and manage the food services. The terms of the food service contract are not favorable to the district in that the food service operation is not required to reimburse the district for custodial services provided on behalf of the district. The other contract is with Student Transportation Specialist, LLC (STS) that has been in effect since 2006. Primarily, STS is in charge of the development and design of bus routing and may not be operating routes in the most cost effective manner. Without adequate contract oversight, the district is not able to identify issues and implement the necessary contract changes or adjustments as needed. During contract re-negotiations, the director of Purchasing and/or the assistant superintendent for Business and Support Services should develop detailed spreadsheets showing the fiscal impact estimates of re-negotiated contract terms. These implications should be presented to the board so that board members can fully understand the reasons for contract changes, and have a basis to evaluate whether new terms are in the district's best interest.

- **Increase Human Resources (HR) staff and reorganize the department around areas of responsibility.** The HR Department does not meet industry standards for staffing guidelines and is not organized around work functions performed by the department. Similar duties within the HR Department are performed by several staff and are not aligned under the same supervisor, and some staff members have a disproportionate number of responsibilities. Also, as currently staffed, the HR Department does not have enough employees to properly address several major strategic matters including process improvement, absenteeism, and employee retention. According to the 2009 Society for Human Resource Management (SHRM) Human Capital Benchmarking Study, an organization such as WISD with approximately 2,100 employees typically has a minimum of 12.6 full-time equivalents (FTEs) in their HR department. The WISD HR Department

has 2.6 fewer FTEs than is recommended. The HR Department should adjust the organizational alignment and job duties of existing positions and add one additional personnel specialist to the HR Department. These changes would cost the district $37,820 annually or $189,100 over five years, which accounts for cost of the salary and benefits of hiring one additional employee.

- **Revise district policy for tagging and tracking small dollar items and annually perform physical inventories of all furniture, fixtures, and equipment at each campus.** WISD does not maintain an adequate inventory system. The district tags and tracks too many small-dollar equipment items for reasonable physical inventory, and physical counts of equipment are not formally summarized and reconciled by the district's Business Office. For larger districts such as WISD, this decision to tag and track lower value items makes the inventory process more time-consuming and difficult on staff to maintain and monitor. In addition, the district currently provides each campus with listings of assets assigned to the campus to facilitate the annual inventory. However, the physical inventories at each school are not monitored, and the results are not aggregated and reconciled by the Business Office. Failure to adequately monitor district assets through annual physical counts can result in misstated financial statements, increased cost for replacement of lost or stolen equipment, additional costs for insurance coverage, hinder recovery for destroyed equipment in the event of a fire or flood, and obstruct the technology department's ability to assess the needs of schools for electronic equipment. WISD should ensure that each school or department is tracking the same equipment types and collecting the same information for its inventory; establish a period during the spring semester to conduct the physical inventories; provide control lists of equipment for each campus to validate; make scanners available for each campus; designate one Business Office staff member to coordinate the physical count, aggregate the results, and reconcile the equipment; review and approve the results of the annual physical inventory; and conduct periodic internal audits to ensure that the physical counts at each campus are conducted in accordance with district policies.

GENERAL INFORMATION

- Waco ISD is located in McLennan County and serves most of the city of Waco, with Midway, Connally, China Spring, La Vega, and Bosqueville ISDs also serving parts of the city. Waco is also home to Baylor University, McLennan Community College, and Texas State Technical College.
- The school year 2010–11 district profile as listed in the Academic Excellence Indicator System (AEIS) of the Texas Education Agency (TEA) reflects the following demographics:
  - an enrollment of 15,240 students;
  - 11.2 percent White;
  - 55.3 percent Hispanic;
  - 31.4 percent African American; and
  - 2 percent American Indian, Asian, and Two or More Races.
- In school year 2010–11, approximately 87 percent of students were economically disadvantaged, 68 percent were at-risk, and 17 percent were identified as limited English proficient (LEP).
- Under the state accountability system, the district received an *Academically Acceptable* rating for school year 2010–11 from TEA. In the past six years, the district was rated *Academically Acceptable* for all years except 2008–09 when it received an *Academically Unacceptable* rating. In 2010–11, three campuses were rated *Exemplary*, seven were rated *Recognized*, 10 were rated *Academically Acceptable*, eight were rated *Academically Unacceptable*, one was rated *Academically Acceptable* in the Alternative Education Accountability system, and three were not rated.
- Under the accountability provisions in the No Child Left Behind Act, all public school campuses, school districts, and the state are evaluated for Adequate Yearly Progress (AYP). The district's preliminary 2011 AYP results indicated that WISD "Missed" AYP due to English language arts and reading (ELA-reading) and mathematics performance for African American and special education students. Additionally, all students and economically disadvantaged students "Missed" AYP ELA-reading and mathematics performance, and Hispanic students "Missed" AYP ELA-reading performance due to the 2 percent and/or the 1

percent federal caps regulating alternative assessments for students receiving special education services. The district is in Stage 3 of School Improvement Program Requirements for ELA-reading and mathematics for the 2011–12 school year. The district "Missed" AYP in 2008–09 and 2009–10. In 2011, 18 WISD schools "Met" AYP, 11 schools "Missed" AYP, and three schools were not evaluated.

- The superintendent is Dr. Bonny Cain, who came to the district in March 2011 from Pearland ISD, where she had been superintendent for 11 years.
- Anticipating an additional $3.4 million loss in state funding, the Waco ISD Board of Trustees in February 2012 voted to close nine campuses and make more efficient use of facilities rather than eliminating academic programs and positions.
- The district is served by the Regional Education Service Center XII (Region 12) in Waco.
- The district is represented by State Senator Brian Birdwell, State Representative Charles Anderson, and State Representative Marva Beck.

SCHOOLS

The district has 32 schools, including the following:

- 17 elementary schools (PK–Grade 5);
- one intermediate school (Grades 5–6);
- five middle schools (Grades 7–8);
- three high schools (Grades 9–12);
- two Montessori magnet schools (PK–Grade 6) and (PK–Grade 8); and
- four alternative/transitional schools.

FINANCIAL DATA

- Total actual fiscal year 2009–10 expenditures: $234,951,734.
- Fund balance as a percent of total budgeted expenditures was 23.1 percent (fiscal year 2010–11) compared to the state at 18.7 percent.
- Final calendar year 2010 Tax Rate: $1.366 ($1.040 Maintenance and Operations and $0.326 Interest and Sinking).
- Final WISD total wealth per student: $241,107 with final wealth per WADA (calendar year 2010) at $190,234.
- In fiscal year 2009–10, 32.6 percent of total actual expenditures were spent on instruction while 55.6 percent of actual operating expenditures were spent on instruction.
- Instructional expenditure ratio (general funds) for fiscal year 2009–10 was reported at 61.8 percent compared to the state at 65.3 percent.

The following table summarizes the fiscal impact of all 60 recommendations in the performance review.

FISCAL IMPACT

	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
Gross Savings	$582,709	$2,130,566	$2,182,362	$2,182,362	$2,182,362	$9,260,361	$0
Gross Costs	($417,535)	($492,535)	($492,535)	($331,654)	($331,654)	($2,065,913)	($225,000)
TOTAL	**$165,174**	**$1,638,031**	**$1,689,827**	**$1,850,708**	**$1,850,708**	**$7,194,448**	**($225,000)**

CHAPTER 1

DISTRICT ORGANIZATION

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 1. DISTRICT ORGANIZATION

Waco Independent School District (WISD), established in the late 1800s, is located in central McLennan County in the city of Waco, approximately halfway between the Texas cities of Austin and Dallas. According to the 2010 census, the city had a population of 124,805, an increase of almost 10 percent since the 2000 census.

Waco is situated along the banks of the Brazos River on the I-35 corridor. The city was founded in 1849 and named after a Wichita Native American group known as the "Hueco." In 1866, Waco's leading citizens embarked on a project to build the first bridge to span the Brazos River. Completed in 1870, the economic effects of the bridge were immediately felt. With the safe crossing available, the population of the area grew rapidly. Known as the home of the soft drink Dr. Pepper, invented in a Waco drug store in 1885, the early economy was based largely on cattle ranching and cotton.

Waco is home to three institutions of higher learning: Baylor University—the oldest institution of higher learning in the state of Texas, McLennan Community College, and Texas State Technical College. The city is also known for its Dr. Pepper Museum and the Texas Ranger Hall of Fame Museum. In 1978, bones determined to be 68,000 years old were discovered emerging from the mud at the confluence of the Brazos River and the Bosque River. These consisted of 24 mammoths, 1 camel, and 1 large cat, making it one of the largest finds of its kind. The National Park Service is looking at the site for possible inclusion into the National Park system. The top employers in the city are shown in **Exhibit 1–1**.

The district's vision statement is "Waco ISD: Pioneering 21st Century Learning," and its mission statement is "Waco ISD will ensure innovation and excellence in education to prepare all learners for productive engagement in a global society." The district's core values and strategy areas and goals are presented in **Exhibit 1–2** and **Exhibit 1–3**.

EXHIBIT 1–1
CITY OF WACO LARGEST EMPLOYERS

EMPLOYER	EMPLOYEES
Providence Health Care	2,434
Baylor University	2,360
Waco ISD	2,350
City of Waco	1,729
Hillcrest Health System	1,350
L-3 Communications	1,619
H-E-B	1,350
Wal-Mart	1,290
Sanderson Farms, Inc.	1,170
Midway ISD	955

SOURCE: Waco Chamber of Commerce, 2011.

BOARD GOVERNANCE

The district is governed by a seven-member Board of Trustees (board) elected through five Single-Member districts and two At-Large districts (**Exhibit 1–4**). There are three positions whose terms expire in May 2012. The board generally meets twice monthly, one meeting being a workshop and one meeting being a regular business meeting. The board meets at the WISD Conference Center at 115 South 5th Street. The workshops are generally held on the third Thursday of the month at 6 PM. Business meetings are generally held on the fourth Thursday of the month with open session beginning at 7 PM. The board also holds special meetings as needed.

Following each regular board meeting, the district posts an electronic bulletin called Board Briefs on its website. The information contained in the Board Briefs includes approved budget amendments, approved action items such as bid awards, contract awards, actions regarding personnel matters, and policy revisions. The bulletin also includes the information and reports that staff present to the board including program updates and student achievement statistics. Official minutes of board meetings as well as workshops and special meetings are posted on the district's website after being approved by the board.

As required by the Texas Education Code (TEC), the school board's members have obtained the necessary training to serve as a board member. The board uses the services of the Regional Education Service Center XII (Region 12) professional development services which are provided to school districts at reasonable prices. Because Region 12 is located in the city of Waco, the board does not incur travel expenses when receiving this training.

EXHIBIT 1–2
WISD CORE VALUES
2011–12

- Waco ISD believes the active engagement of the community in the learning process and development of students contributes to student success.
- Waco ISD believes that active parent participation and support foster student success.
- Waco ISD values instruction that engages all learners in a continuous improvement process.
- Waco ISD believes that recognizing and celebrating student, employee and community accomplishments promotes pride, builds self-esteem, and generates motivation for further success throughout the district.
- Waco ISD believes higher expectations are necessary at all levels of the organization to provide educational opportunities which ensure that students are equipped to succeed in the 21st century.
- Waco ISD values an equitable system that promotes educational opportunities for all students and a positive work environment for all employees.
- Waco ISD believes that it is accountable to its stakeholders for academic achievement, fiscal responsibility and community involvement.
- Waco ISD believes the 21st century learning environment must be safe and secure physically, emotionally and academically.
- Waco ISD believes leadership development is necessary to promote innovation, excellence, personal integrity and accountability for all learners.
- Waco ISD believes that recruiting, supporting and retaining quality employees by offering competitive compensation and leadership development opportunities promote student success.

SOURCE: WISD Vision, 2011.

EXHIBIT 1–3
WISD STRATEGY AREAS AND GOALS
SCHOOL YEAR 2009–10 TO 2013–14

INSTRUCTION: Waco ISD will implement a comprehensive plan to enhance learning opportunities for all students.

ORGANIZATION AND MANAGEMENT: Waco ISD will recruit, support, and retain quality employees who are collaborative, innovative, and accountable for all learners.

MARKETING AND SERVICE: Waco ISD will engage parents and the community to provide all students the support and experiences they need to be successful.
Waco ISD will communicate effectively with internal and external constituents.

FINANCE AND FACILITIES: Waco ISD will execute an effective, efficient long-range plan to optimize facilities use, personnel assignments, material acquisitions, and financial stability.

RESEARCH, DEVELOPMENT, AND ACCOUNTABILITY: Waco ISD will improve district performance by exploring, examining, and analyzing internal and external data.

SOURCE: WISD Vision, 2011.

EXHIBIT 1–4
WISD BOARD OF TRUSTEES
2011–12

NAME	TITLE	TERM EXPIRATION	LENGTH OF SERVICE	OCCUPATION
Pat Atkins, At-Large	President	May 2012	10 years	Attorney
Allen Sykes, District 5	Vice President	May 2013	12 years	Bank Vice President
Angela Tekell, District 4	Secretary	May 2013	2 years	Attorney
Larry Perez, District 3	Member	May 2014	10 years	Retired Postal Worker
Norman Manning, District 1	Member	May 2012	3 years	McLennan County Maintenance
Alex Williams, District 2	Member	May 2012	11 years	Retired Educator
Cary DuPuy, At-Large	Member	May 2014	1 year	Owner DuPuy Oxygen

SOURCE: WISD Administration, November 2011.

DISTRICT ADMINISTRATION

According to the employment contract, the superintendent is the chief executive of the district and is responsible for performing the duties of the superintendent prescribed in district policy, the job description, and as may be assigned by the board. Further, the contract states the superintendent shall comply with all board directives and state and federal laws. The superintendent oversees management of daily operations of the district and is charged with directing, assigning, reassigning, and evaluating all of the employees of the district.

The WISD superintendent is Dr. Bonny Cain. Prior to being named as the WISD superintendent, Dr. Cain served as superintendent of Pearland ISD for 11 years. Her prior positions include serving as deputy superintendent, assistant superintendent for instruction, executive director, principal, and teacher.

The superintendent's contract term runs from March 14, 2011 through June 30, 2014. The contract calls for the board to annually evaluate the superintendent by August 31 of each year. The board did not hold an evaluation meeting with the superintendent in 2011 because she was new in the district. However, the superintendent presented a draft of district goals to the board in July and August, 2011, with the board approving the goals in November 2011.

SCHOOL ADMINISTRATION

The district has staffing formulas for elementary, middle, intermediate, high, and magnet schools for positions including principal, assistant principal, counselor, aides, physical education instructors and aides, nurse, secretary, Public Education Information Management System (PEIMS) clerk, and parent campus liaison. Each school is assigned a full-time principal position. Assistant principal positions are staffed using the allocation schedule shown in **Exhibit 1–5**. Further, WISD's 2010–11 ratio of pupils to campus administrators (214.65 to 1) is below the state average (261.90), indicating higher staffing levels relative to the student population.

LEGAL SERVICES AND EXPENDITURES

School districts operate under a wide range of local, state, and federal laws, rules, and regulations. To ensure compliance with the TEC and other state statutes, school districts must seek legal advice. In addition to ensuring compliance with laws and regulations, districts must also use attorney services to issue bonds, handle delinquent taxes, and represent district interests in employee and special education lawsuits.

EXHIBIT 1–5
WISD STAFFING ALLOCATION FOR ASSISTANT PRINCIPAL POSITIONS
2011–12

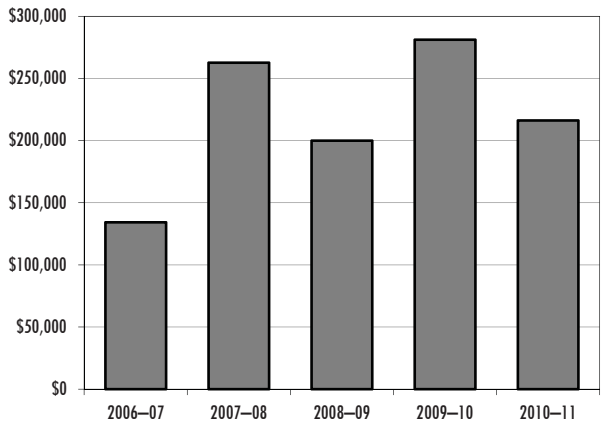
STUDENT ENROLLMENT	# ASSISTANT PRINCIPALS
ELEMENTARY SCHOOLS	
250 – 449	0.5
450 – 750	1.0
751+	1.5
MONTESSORI MAGNET SCHOOLS	
0 – 500	1.0
501+	2.0
MIDDLE/INTERMEDIATE SCHOOLS	
0 – 499	1.0
500+	2.0
HIGH SCHOOLS	
0 – 400	1.0
401 – 800	2.0
801 – 1,200	3.0
1,201+	4.0

SOURCE: WISD Recommended Staffing Guidelines, May 2011.

WISD uses an effective strategy to mitigate its legal costs. The district does not have a staff attorney, instead having retainer agreements with local as well as non-local contracted attorneys specializing in school district matters. Using outside firms rather than an in-house attorney provides a wide array of legal specialists that may not be available through a single staff attorney. To keep legal fees in check, the board also holds most of its meetings without an attorney present, using legal representation only for critical personnel issues, real estate transactions, or other issues having legal implications.

Exhibit 1–6 shows a five-year history of total legal fees for WISD. Legal fees spiked in 2007–08 and 2009–10. These increases were the result of bonds issued by the district, necessitating bond counsel costs of $137,500 and $50,281 for 2007–08 and 2009–10, respectively. In addition to bond counsel, the district has had to incur costs for hearings, a legal hot line, and attorney fees associated with Special Education issues.

EXHIBIT 1–6
WISD LEGAL FEES
2006–07 TO 2010–11



SOURCE: WISD accounting records, 2006–07 to 2010–11.

MANAGEMENT INITIATIVES

During the review team's onsite visit, the district was undergoing several audits or reviews including a review of data submitted to the state for its PEIMS accountability system, a route efficiency audit of the district's transportation function, a technology review, a facility condition assessment, and an operational audit.

ACCOMPLISHMENT

- WISD's Board of Trustees is an efficient and effective body, conducting their business in a cohesive and professional manner even when faced with difficult and trying circumstances.

FINDINGS

- WISD lacks an internal audit function to independently monitor and report compliance with policies, regulations, or laws to the Board of Trustees.
- The district does not have a site-based decision-making framework that defines decision authority between the central office and the schools.
- WISD lacks a strategic planning process and measurable objectives to hold the district accountable for efficiently and effectively meeting the needs of its students.
- The district's annual planning and budgeting activities are not sequenced to provide a link between setting goals and identifying resources to obtain those goals.

RECOMMENDATIONS

- **Recommendation 1: Reinstate the internal audit function and have it report directly to the Board of Trustees.**
- **Recommendation 2: Establish a site-based decision-making framework to delineate authority for WISD's central administration and schools and update the district's handbook accordingly.**
- **Recommendation 3: Develop a long-range strategic plan with measurable objectives for which the superintendent and management team are held accountable.**
- **Recommendation 4: Execute the sequence of the annual planning process before budgeting to better link financial resources to district priorities.**

DETAILED ACCOMPLISHMENT

EFFICIENT AND EFFECTIVE BOARD OPERATIONS

WISD's Board of Trustees (board) is an efficient and effective body, conducting their business in a cohesive and professional manner even when faced with difficult and trying circumstances. The board has a healthy respect for one another as well as staff and community members. Further, when faced with critical situations such as a student safety issue in 2010 followed by the resignation of key staff including the previous superintendent, the board acted quickly and deliberately to address these issues.

Starting in March 2010, the issue regarding student safety took up much of the board's time. A teacher accused of placing a child's safety at risk was investigated by WISD staff, and returned to the classroom following the internal investigation. Parents were not aware of the issue until after the teacher was arrested several months later, after having already been placed back in the classroom. As a result, the board held many special meetings to hear updates from staff, including almost 15 hours of meetings held over two days in late March 2010 to discuss needed policy and procedural changes, to meet with the board's attorney, and to listen to and address parent and community member concerns.

In May of 2010, the board voted not to extend the prior superintendent's contract, which ran through 2012. This

action was followed by the resignation of the director of Human Resources as well as the prior superintendent in July 2010.

Following the July 2010 resignation of the superintendent, the board moved quickly to appoint an interim leader and proceed with a search for a new superintendent. On July 29, 2010, the board appointed the assistant superintendent for Business and Support Services as interim superintendent and named three board members to a search committee. The board devoted a significant amount of time to interview superintendent search firms, obtain updates regarding the search process, and to interview the six candidates. In total, the board spent over ten hours in special meetings during the superintendent search process, over 12 hours interviewing the candidates, and an additional eight hours conducting follow-up interviews. In January 2011, the board selected Dr. Bonny Cain as its lone finalist for the position. The board signed a contract with Dr. Cain in February 2011, and she started working in March.

School board minutes show that regular board meetings rarely last more than two hours, a sign of efficiency, and that, in general, there is good attendance by all members. However, when needed, the board has dedicated sufficient time to handling matters in a thoughtful and purposeful way. Maintaining the required training, understanding the role of the board, and working together to resolve difficult district issues has helped WISD's board to operate effectively and efficiently.

DETAILED FINDINGS

INTERNAL AUDIT FUNCTION (REC. 1)

WISD lacks an internal audit function to independently monitor and report compliance with policies, regulations, or laws to the board. The district recently abandoned its internal audit function, leaving the district at risk of failure of detecting possible fraud or other irregularities that could affect an organization in a negative way.

The district's organization structure is shown in **Exhibit 1–7** and includes an assistant superintendent for Curriculum, Instruction, and Assessment; assistant superintendent for Business and Support Services; executive director of Human Resources; director of Communications; Athletic director; Police Chief; coordinator of Community Resources; and Systems and Controls coordinator, all reporting directly to the superintendent. This is a relatively flat or lean organization structure, with eight direct reports to the superintendent.

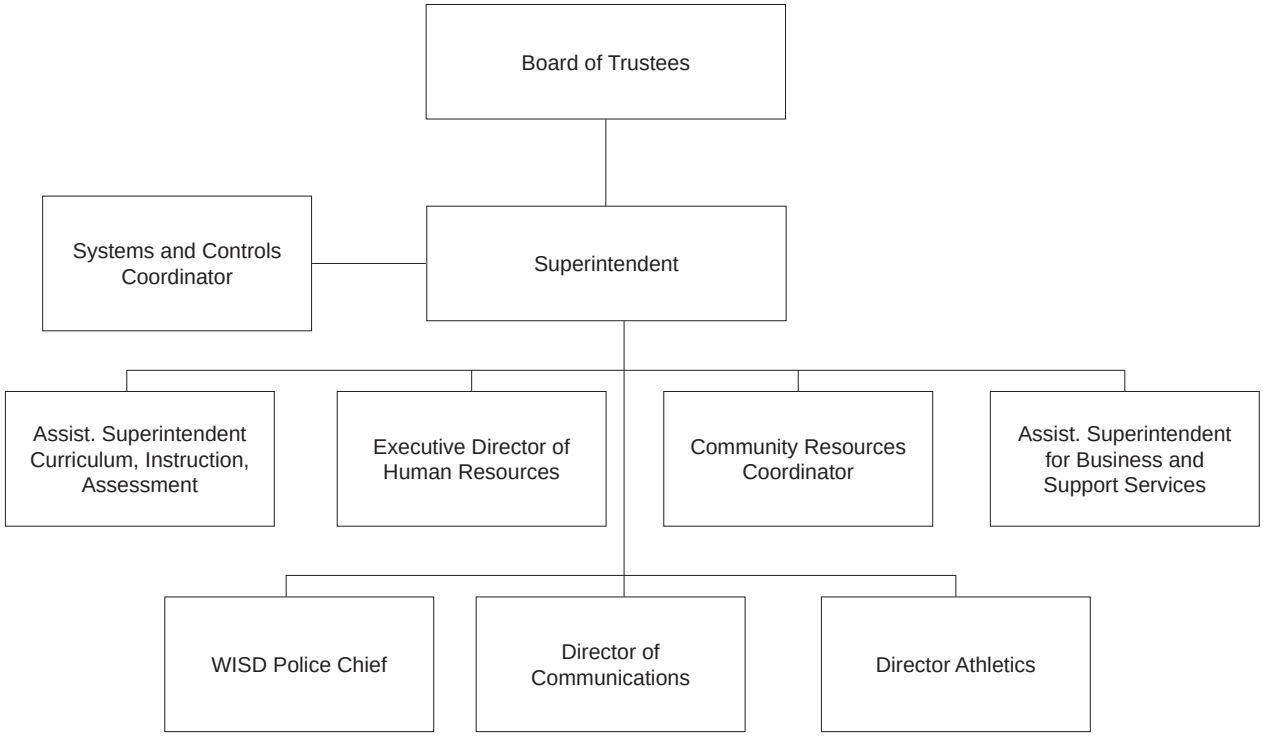
The newly created Systems and Controls coordinator (coordinator) position was filled in January 2012. This position was created when the district's internal auditor position was vacated in July 2011. Funding for the internal auditor position, which reported to the board, was used to create the new coordinator position which reports directly to the superintendent. While the job description of the coordinator is similar to an internal auditor, there are some key differences between the coordinator and an internal auditor position. Primarily, an internal auditor's work is directed by a risk assessment that informs which functions in the organization are most at risk and helps to focus the auditor's efforts. An internal auditor also prepares a work plan that is approved by the board, and the work plan is what the auditor focuses on for the upcoming year. Any deviations from the plan, such as special investigations, are reviewed and approved by the board.

The newly created coordinator position reports to the superintendent instead of the board, and the superintendent directs the coordinator's work rather than work being guided by a risk assessment and audit plan. The coordinator's job description also includes a role in implementing changes/recommendations within WISD, whereas an internal auditor functions independently and does not have a role in implementation of recommendations. In general, the job description for the coordinator includes being involved in operational activities and helping to implement change in the district. An internal auditor, due to requirements of independence, does not get involved with an organization's operations or in implementation assistance.

Based on a review of board minutes, there was no evidence that the prior internal audit function in the district ever directly reported to the board as required by the TEC Section 11.170. While the district has not received recurring management letter comments or been notified of internal control weaknesses by its external auditor, there have been instances of theft and compliance violations over the past several years that warrant an internal audit function.

- In 2009 and 2010, the district received criticism for the way it conducted an internal investigation related to a child safety issue at one of its campuses. A teacher was placed back on duty following an internal investigation that cleared the teacher of any wrong-doing in 2009, yet this teacher was later arrested in 2010 for actions concerning a WISD student.

EXHIBIT 1–7
WISD ORGANIZATION
2011–12



SOURCE: WISD Administration, November 2011.

- In May 2011, the district's Technology Services director resigned over the mishandling of surplus equipment and poor supervision of employees.

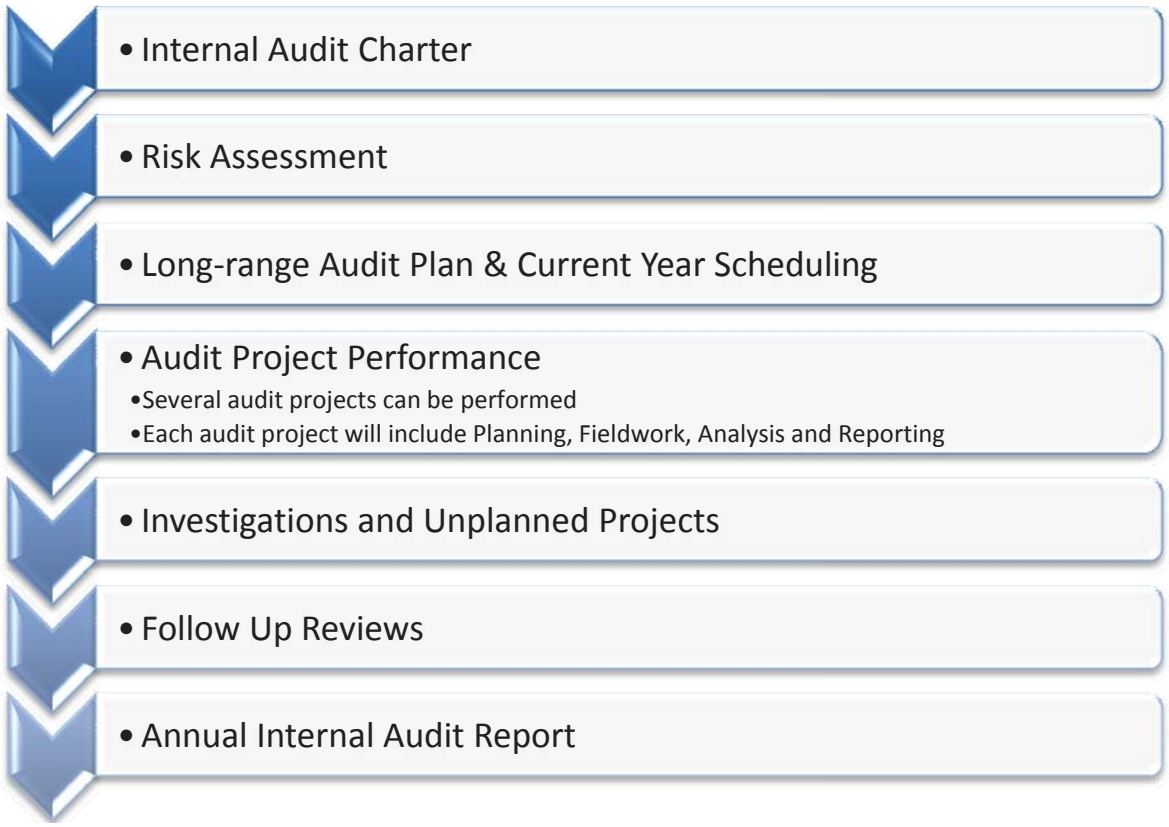
Further, the Texas State Auditor's Office recommends that all school districts with annual operating expenditures in excess of $20 million and with more than 5,000 students have an internal audit function. Through the identification of control weaknesses, compliance violations, theft and other findings, internal audit functions generally pay for themselves and represent a good investment by a school system.

The district should reinstate the internal audit function and have it report directly to the Board of Trustees. **Exhibit 1–8** presents the major steps of an internal audit function. The development of an internal audit function should begin with the establishment of a charter that defines the scope, responsibility, and authoritative guidelines of the function. The Texas Association of School Business Officials, as well as other school districts, has templates that can be used as a starting point at WISD. A risk assessment should then be developed to determine the areas of highest risk for immediate attention. Lower risk areas can be subject to internal audits on a cycle basis. Audits of specific program or functional areas should be mapped against a five-year calendar in the development of a long-term audit program plan. Special projects or investigations may occur outside this plan based on specific needs identified by the board. However, the internal audit function should be driven primarily by the risk assessment and not be used as an ad hoc investigatory tool by the board.

Reports for each internal audit should be submitted to the board for approval. At the end of each school year, an annual report should be presented showing planned versus actual audits conducted, the outcomes of each, and planned changes for the subsequent year.

The district should budget $90,000 annually for an internal audit function. This will support the salary and benefits of $82,800 for one full-time equivalent staff position ($72,000 base salary +15 percent estimated benefits rate) and supporting expenditures of $7,200 (cell phone allowance of $500; training and licensure of $3,200; and supplies and other expenses of $3,500). The position should require no less than 10 years of experience in performing internal audits,

EXHIBIT 1–8
INTERNAL AUDIT FUNCTION - MAJOR STEPS



SOURCE: Review Team, December 2011.

preferably in school systems. Based on the risk assessment, additional support staff resources may be warranted.

Within three years, the superintendent should consider eliminating the position of Systems and Controls coordinator and maintain only the internal auditor position. The review team believes this is a reasonable time period for the coordinator to achieve the goals set out by the superintendent for this position. However, at this point in time, the district needs both positions to inform management and the board of what work needs to be performed to get the district back on track.

The district currently budgets $85,881 annually for the Systems and Controls function. Within three years when this position is transitioned out, the net fiscal impact will be $4,119 ($90,000 for the internal audit function minus $85,881 for the Systems and Controls function). The resulting five-year fiscal impact of this recommendation is $278,238 net cost.

SCHOOL ADMINISTRATION AND DECISION-MAKING (REC. 2)

The district does not have a site-based decision-making framework that defines decision authority between the central office and the schools. As a result, decision authority is not consistently applied. Job descriptions for principals indicate that principals are responsible for managing instructional programs; service operations and personnel at the campus level; and for providing leadership to ensure high standards of instructional services. Principals are also responsible for overseeing compliance with district policies, success of instructional programs, and operation of all campus activities. Specific job responsibilities and duties delineated in their job descriptions show that principals are to:

- provide instructional resources and materials to support teaching staff in accomplishing instructional goals;

- encourage active staff involvement in the decision-making processes;
- interview, select, and orient new staff and approve all personnel assigned to a campus;
- make recommendations to the superintendent on termination, suspension, or non-renewal of employees assigned to campuses;
- comply with district policies and state and federal laws and regulations affecting schools;
- develop campus budgets based on documented program needs, estimated enrollment, personnel, and other fiscal needs;
- keep programs within budget limits; and
- maintain fiscal control and accurately report fiscal information.

No guidelines exist in the job descriptions or any other district document to inform principals and central office staff what decisions lie within their respective authorities. Since the time of the onsite visit, the district provided the review team with a document entitled Campus Decision Making Handbook prepared in 1999 as its guide to site-based decision-making. However, the document primarily focuses on how campuses should establish site-based decision-making teams, how team members should be selected, and how meetings should be held. The appendix to the handbook presents a matrix showing the types of issues faced by the district and who can deal with the issues. The matrix presents the division of responsibility for dealing with issues as either campus, shared (campus in coordination with district office), district office, and board of trustees.

Further review of the handbook shows that it is outdated and incomplete. For example, the handbook states that custodial staff will be a centrally managed function, but the district's practice at the time of the onsite review is that custodial staff is managed at the campus level. The handbook provides general decision-making guidelines. Without specific instructions on function and responsibility, staff may not understand their decision-making authority and responsibility.

In addition, during interviews of the subject of decision-making, staff in the district either did not refer to the handbook or stated that no such document existed. Interviews with campus staff revealed a wide range of interpretation as to what principals and campus staff have authority over. In one instance, a principal revealed to the review team the specific types of decisions the principal could make without getting central office approval. Yet an administrator at another campus said the central office "likes for us to get approval prior to making decisions, but we don't always get prior approval." Further, the review team had several district employees state "we are a system of 32 ISDs," referring to each of the district's 32 campuses and how decisions are made independent of the central office on issues such as which programs to implement and what types of staff development are obtained.

The lack of clear direction over decision-making authority increases the likelihood for inconsistent or duplicative programs, technology solutions, and professional development options, among other items.

Some decisions need to be made or guided centrally in order to provide consistent application and efficient operations at the schools and central administration. Other decisions, such as differentiation of instruction for individual students, can and should be made at the school level. Documentation of a single decision-making framework will help ensure that all principals and central administrators understand the ground rules for decision-making. Adopting a decision-making framework will ensure its consistent use by all positions involved in decision-making. At a minimum, decisions can be identified by the following four categories:

1. **Site-based decisions not requiring central administration approval**. Decisions that can be made or approved independently by principals or their designees without intervention or approval required of the central administration. These decisions might include teaching strategies used, certain disciplinary actions, and assignments of special projects to staff.
2. **Site-based selection from a list of district-provided options**. Examples of selection lists might include computer and instructional software purchases. Schools can be given choices of computer brands and software as long as they meet minimum specifications established by the central administration technology function. Making purchases not on the approved list could result in the inability of the technology function to effectively support hardware or software. Selecting from a list provides decision-making flexibility within a framework that helps ensure districtwide efficiency and effectiveness.

3. **Site-based decisions requiring central administration approval**. Certain decisions, such as hiring or terminating school staff, should require the approval of the central administration, as the human resources department should be involved in these decisions to ensure compliance with state and federal laws and district policy.

4. **Central administration decisions**. There are certain decisions that should be made by central administration and enforced at all schools. A single standardized curriculum and the school bell schedule are examples of decisions that should be established, or standardized, by central administration. In making these decisions, however, central administration should solicit input from schools to ensure that decisions make sense for the schools as well as the district.

The district should establish a site-based decision-making framework to delineate authority for WISD's central administration and schools and update its handbook accordingly. A solid framework will help provide consistency throughout the district, but will allow adequate flexibility for campuses to address the needs of their students and staffs.

In developing a site-based decision-making framework, the authority—using the four categories mentioned earlier—should be defined for the types of decisions, as shown in **Exhibit 1–9**. After updating the district's handbook, all campus and administrative staff should be trained in the types of issues that they have authority over.

In implementing this recommendation, central administration should conduct a brief staff survey to gauge perceptions of decision-making authority based on the list of decisions included in **Exhibit 1–9**, and any additional decision areas desired by district management. A committee of eight principals (four elementary and four secondary) and instructional directors should be convened to review the survey results and develop the decision-making framework.

Once the framework has been developed and approved by the superintendent, all principals, assistant principals, and pertinent central office staff should receive training on the new framework.

This recommendation can be implemented using existing resources.

STRATEGIC PLANNING AND MEASURABLE OBJECTIVES (REC. 3)

WISD lacks a strategic planning process and measurable objectives to hold the district accountable for efficiently and effectively meeting the needs of its students. Although the district develops an annual district improvement plan (DIP) and campus improvement plans (CIPs), developing the DIP and CIPs are required by state law, specifically Chapter 11, Subchapter F, Sections 11.251 and 11.252 of the TEC. These plans, however, are prepared for the upcoming school year and do not project district goals or prescribe activities beyond this time frame.

The district's most recent DIP was approved by the board in November 2011. **Exhibit 1–10** shows the district's 10 goals contained in the 2011–12 DIP.

The DIP includes lower level performance expectations, some of which are measurable and some of which are process related. But these expectations are not driven by any long-term targets established by the board in a strategic planning document.

There was an attempt in recent years to develop a long-range strategic plan. During 2008 through 2010, the board met monthly in long-range planning meetings to discuss district issues and receive updates from staff in regards to the development of a strategic plan. In 2008, the district began an effort to develop a long-range strategic plan which included meetings with stakeholders and community members. After one year, the board approved a high level planning document at its May 28, 2009, board meeting. However, the approved plan contained no action plans or assignments of district staff to be held responsible for achievement of goals and objectives. Minutes of the long-range planning meetings, as well as minutes of regular board meetings, show that the district continued to discuss the establishment of action plans in 2009 and 2010, but there is no evidence that any plans were ever developed.

The strategic planning process appeared to be side-tracked by several significant issues in the district, primarily a turnover in key staff in 2010 and 2011 including the director of Assessment and Evaluation, the director of Human Resources, the Technology Services director, and the superintendent.

Board members spoke to the review team about the district's attempts at developing a long-range strategic plan, but the process became bogged down and was never completed. Further, board members stated that they currently feel the

EXHIBIT 1–9
SITE-BASED DECISION-MAKING FRAMEWORK
RECOMMENDED TEMPLATE

DECISION	(A) PRINCIPAL DECISION	(B) PRINCIPAL CHOICE	(C) CENTRAL ADMIN APPROVAL	(D) CENTRAL ADMIN DECISION
Curriculum/curriculum guides				
Ability to re-allocate instructional and/or non-instructional staff to meet needs identified by school				
Benchmark testing				
Course offerings (secondary)				
Identification of professional development needs				
School calendar				
School bell schedule				
Class size				
Bus routes				
Cafeteria schedule				
Authority over custodians and how they spend their time				
Authority over food service workers and how they spend their time				
Work schedules for any categories of staff				
Number of work days per year for any categories of staff				
Block scheduling (secondary)				
Terminating school staff				
Hiring school staff				
Establishing staffing needs				
Establishing non-staff budget needs				
School facility renovations				
Student discipline – code of conduct				
Student activity funds – software/processes				
Class rank determination/computation				
Purchasing decisions as they relate to teachers' or principals' authority to select vendors, versus using the central administration purchasing department or only pre-approved vendors				
Computers/servers				
Instructional software purchases				

SOURCE: Review Team, December 2011.

new superintendent should be allowed to focus on taking action on the district's most challenging issues without being hampered by a lengthy planning process.

The minutes from board long-range planning meetings, workshops, and board meetings indicate a significant number of programs being put in place to try to address district issues such as college readiness, student performance, and workforce readiness. However, there is no indication that these programs are ever assessed for their effectiveness.

Several indicators reveal the consequences of not having a long-range strategic plan. For instance, in January 2010, the district was granted $150,000 to implement an International

EXHIBIT 1–10
WISD DISTRICT IMPROVEMENT PLAN GOALS
2011–12

INSTRUCTIONAL MANAGEMENT: CURRICULUM, ADVANCED ACADEMICS, FINE ARTS
DISTRICT GOAL 1: increase student achievement.
INSTRUCTIONAL MANAGEMENT: COLLEGE AND CAREER READINESS
DISTRICT GOAL 2: Increase student achievement, participation, and performance.
INSTRUCTIONAL MANAGEMENT: ATHLETICS
DISTRICT GOAL 3: Increase the success of all athletic programs in grades 7 through 12.
INSTRUCTIONAL MANAGEMENT: ENVIRONMENT
DISTRICT GOAL 4: Increase districtwide attendance.
DISTRICT GOAL 5: Increase the graduation rate and decrease the dropout rate.
HUMAN RESOURCES MANAGEMENT: RECRUIT AND RETAIN
DISTRICT GOAL 6: Recruit, support, and retain quality employees who are collaborative, innovative, and accountable for all learners.
COMMUNITY RELATIONS: COMMUNICATIONS
DISTRICT GOAL 7: Produce an up-to-date monthly districtwide calendar that is maintained on the WISD website by Christmas 2011.
DISTRICT GOAL 8: Produce and deliver via list-serve weekly newsletters and highlights by February 2012.
DISTRICT GOAL 9: Implement a WISD user-friendly website to be live with current and informative campus-like levels by Thanksgiving 2011.
OPERATIONS MANAGEMENT
DISTRICT GOAL 10: Provide efficient and effective operations that maximize resources.

SOURCE: WISD District Improvement Plan 2011–12, adopted by the Board of Trustees, November 17, 2011.

Baccalaureate program. After several attempts to get the program operating in 2010 and 2011, but with little or no progress, the superintendent thought it would be best to return the funds to the grantor because the district was not yet ready to see such an effort through to fruition. Another example is a lack of district focus for professional development. Interviews with staff members reveal a variety of issues with professional development, including some employees who are not included in professional development plans as well as duplicative training efforts.

While the DIP provides more specific information about what the district should focus on for the following year, the DIP is not driven by a long-range strategic plan to achieve long-term goals and objectives.

WISD should develop a long-range strategic plan with measurable objectives for which the superintendent and management team are held accountable. The district should embark on this effort by including a wide range of input from staff as well as community members and other stakeholders. Once the superintendent has addressed the district's most pressing issues and has had a chance to evaluate recent changes, the issue of developing a long-range strategic plan should become a priority. These efforts could begin as early as fall 2012.

Having a comprehensive strategic planning process ensures that administrative staff, campus personnel, and principals are in agreement on long-term district direction, use of resources, and goals. Further, a systematic planning process ensures that a process for monitoring and adjusting direction is in place. A strategic planning process can also be a means for obtaining stakeholder "buy-in" by bringing together staff, parents, and community members into the planning process.

In developing this plan, goals should be supplemented with specific and measurable long-term objectives—for both instructional and non-instructional areas.

The superintendent should create a task force and assign a single individual within the leadership team to oversee and guide the strategic planning process. After determining capacity and availability of staff to oversee and conduct the strategic planning process, the superintendent may want to consider the assistance of an outside consultant to lead the district through an initial strategic planning process for the primary purpose of keeping the planning process focused

and adhering to a timeline. An outside consultant can help to lay the foundation for a five-year strategic plan, including assisting the district in conducting community and parent surveys, forums, and focus groups. After the initial strategic plan has been developed, the district can update its plan in future years.

There is no fiscal impact because the district would first need to determine if the strategic planning process could be done in-house or if outside assistance would be necessary.

SEQUENCE ANNUAL PLANNING BEFORE BUDGETING (REC. 4)

The district's annual planning and budgeting activities are not sequenced to provide a link between setting goals and identifying resources to obtain those goals. A school district's budget is the vehicle for allocating financial resources to meet student needs; as such, its budget serves as a financial reflection of its goals and priorities and demonstrates a level of efficiency.

WISD's budget development activities occur before the annual academic planning processes instead of after. Because of this, the budget process does not have the opportunity to strategically meet student needs. In addition, there are no documented or informally established links between district planning and budgeting processes; the budget process largely operates as an independent set of activities. Most WISD schools are locked into staffing and spending levels by prescribed funding formulas.

Exhibit 1–11 presents the current sequencing of the planning and General Fund budgeting processes in the district. The General Fund budget process precedes activities for the performance assessment and the development of goals, which precede the development of district and school planning documents.

WISD should execute the sequence of the annual planning process before budgeting to better link financial resources to district priorities. For the budget to be useful in supporting strategic decision-making, its development needs to occur at the end of the planning process. The assistant superintendent for Business and Support Services should draft a new budget development timeline based on the activities shown in **Exhibit 1–12**. This effort requires an earlier start date for assessment, goal setting, and planning activities. After the superintendent has reviewed and approved the new budget development timeline, the assistant superintendent for Business and Support Services should present and explain

EXHIBIT 1–11
WISD BUDGETING AND PLANNING SEQUENCING ACTIVITIES 2011–12

SOURCE: WISD 2011–12 District Improvement Plan; WISD Budget Calendar; and interviews with WISD principals and district administrators.

EXHIBIT 1–12
PROPOSED SEQUENCING OF PLANNING AND BUDGETING ACTIVITIES FOR WISD

SOURCE: Review Team, December 2011.

the new development sequencing to the leadership team, management and campus staff involved in the budget development process, and to the board.

This recommendation can be accomplished 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	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
1.	Reinstate the internal audit function and have it report directly to the Board of Trustees.	($90,000)	($90,000)	($90,000)	($4,119)	($4,119)	($278,238)	$0
2.	Establish a site-based decision-making framework to delineate authority for WISD's central administration and schools and update the district's handbook accordingly.	$0	$0	$0	$0	$0	$0	$0
3.	Develop a long-range strategic plan with measurable objectives for which the superintendent and management team are held accountable.	$0	$0	$0	$0	$0	$0	$0
4.	Execute the sequence of the annual planning process before budgeting to better link financial resources to district priorities.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 1		**($90,000)**	**($90,000)**	**($90,000)**	**($4,119)**	**($4,119)**	**($278,238)**	**$0**

CHAPTER 2

EDUCATIONAL SERVICE DELIVERY

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 2. EDUCATIONAL SERVICE DELIVERY

EDUCATIONAL SERVICE DELIVERY

Waco Independent School District (WISD) has 32 schools: 17 elementary schools, one intermediate school, 5 middle schools, 3 high schools, 2 Montessori magnet schools, and 4 alternative/transitional schools. WISD is a predominantly Hispanic district. In 2010–11, the WISD student population was 55 percent Hispanic, 31 percent African American, and 11 percent White. Approximately 87 percent of students were economically disadvantaged, 68 percent were at-risk, and 17 percent were identified as limited English proficient (LEP).

Under the state accountability system, the district received an *Academically Acceptable* rating for 2010–11 from the Texas Education Agency (TEA). In the past six years, the district was rated *Academically Acceptable* for all years except 2008–09 when it received an *Academically Unacceptable* rating. In 2010–11, three campuses were rated *Exemplary,* seven were rated Recognized, 10 were rated *Academically Acceptable*, eight were rated *Academically Unacceptable*, one was rated *Academically Acceptable* in the Alternative Education Accountability system, and three were not rated.

Under the accountability provisions in the federal No Child Left Behind Act, all public school campuses, school districts, and the state are evaluated for Adequate Yearly Progress (AYP). The district's preliminary 2011 AYP results indicated that WISD "Missed" AYP due to English language arts and reading (ELA-reading) and mathematics performance for African American and special education students. Additionally, all students and economically disadvantaged students "Missed" AYP ELA-reading and mathematics performance, and Hispanic students "Missed" AYP ELA-reading performance due to the 2 percent and/or the 1 percent federal caps regulating alternative assessments for students receiving special education services. The district is in Stage 3 of School Improvement Program Requirements for ELA-reading and mathematics for school year 2011–12. The district "Missed" AYP in 2008–09 and 2009–10. In 2011 eighteen WISD schools "Met" AYP, 11 schools "Missed" AYP, and three schools were not evaluated.

ACCOMPLISHMENT

- WISD supports job-embedded professional development for teachers through a cadre of district content specialists in the areas of core academic content, Bilingual/English as Second Language (BIL/ESL), Response to Intervention (RtI), advanced academics, and instructional technology.

FINDINGS

- WISD does not have the appropriate organizational structures in place to support adequate educational services so that all students have the opportunity to succeed.
- The district has implemented steps to monitor curriculum alignment but lacks consistency in curriculum implementation, resulting in learning gaps for a highly mobile student population.
- WISD lacks a coherent, systemic instructional program in reading, especially at the high school level.
- The district does not have a systematic professional development plan in place.
- The administration of special education services is not aligned with the general education program, contributing to inaccurate identification of students for services, inappropriate testing, and high discipline rates for special education students.
- WISD does not have adequate counseling, nursing, and library support services to meet the needs of its large economically disadvantaged and at-risk student population.
- WISD does not have adequate systems in place for dropout prevention and recovery.

RECOMMENDATIONS

- **Recommendation 5: Implement support structures at the central office level to address existing communication and culture issues and to strategically focus improvement efforts.**
- **Recommendation 6: Work with Regional Education Service Center XII (Region 12) to consistently implement the CSCOPE curriculum districtwide.**

- **Recommendation 7: Institute a Response to Intervention model districtwide, extending its implementation beyond elementary to secondary school levels, including high school.**
- **Recommendation 8: Develop a coordinated district professional development plan to ensure that all teachers receive certain trainings focused on key district goals.**
- **Recommendation 9: Develop and implement a plan to ensure that all staff understand and feel responsible for addressing the needs of students receiving special education services.**
- **Recommendation 10: Investigate new ways to work with community groups and outside agencies to help ensure that students have the basic health and educational resources necessary to support their success in school.**
- **Recommendation 11: Identify a systems approach to early identification of high-risk students for dropping out, implement and monitor specific prevention interventions, and develop an aggressive recovery effort based on best practice standards.**

DETAILED ACCOMPLISHMENT

SPECIALISTS TO SUPPORT CAMPUS TEACHING

WISD supports job-embedded professional development for teachers through a cadre of district content specialists in the areas of core academic content, Bilingual/English as Second Language (BIL/ESL), Response to Intervention (RtI), advanced academics, and instructional technology.

District leadership is sending a clear message that WISD is committed to its improvement efforts and the success of its students by deploying a team of specialists to support teachers at the campus level. The district's division of Curriculum, Instruction, and Assessment employs content specialists in the core areas of ELA-reading, mathematics, social studies, and science to work with teachers directly in the schools. In school year 2011–12, the division also added content specialist positions for BIL/ESL and advanced academics, illustrating the district's commitment to serving student groups who may have received less than optimal services in the past. The addition of RtI specialists is another indication that the district is making efforts to be proactive and implement strategies to assist struggling students early before they get in academic trouble. Finally, the district refocused the efforts of its instructional technology specialists who, beginning in school year 2011–12, will aid teachers in integrating technology into instruction and using data to improve their instruction.

Typical structures in a district the size of WISD often include directors responsible for each core content area and for student groups such as ESL and advanced academics. These directors would typically have one administrative staff person and would themselves provide formal training to teachers in their areas. However, multiple central office-level programmatic and administrative responsibilities would likely limit the amount of time they could spend in schools working directly with teachers. The content specialists in WISD extend the reach of the department directors, providing "feet on the street" that carry the district message that rigorous content for all students is non-negotiable and that the district is providing resources to help teachers deliver that kind of instruction.

Content specialists also have a major responsibility for professional development in the district. Because the specialists regularly work with teachers in schools, they can better provide tailored, job-embedded training that is linked directly to teachers' day-to-day practice. Job-embedded professional development is school or classroom based and is integrated into teachers' workdays. Rather than being theoretical, generic, or pull-out, job-embedded professional development is focused on specific problems of practice, such as learning to teach a new curriculum or program or making modifications in instruction or materials to meet specific students' needs. This type of professional development can take a variety of formats, from one-on-one coaching to team discussions of student work. High-quality job-embedded learning has the following characteristics:

- It is aligned with the Texas Essential Knowledge and Skills (TEKS) and state assessments. For example, the social studies content specialist is working intensely with high school teachers to prepare for the new end-of-course exams;
- It is based on data. In school year 2011–12, teachers will learn to run their own reports from Eduphoria, looking at student data in real time and using it in planning; and
- It provides time for content specialists to build relationships with teachers focused on specific teacher and student needs. For example, the advanced academics content specialists are working with

teachers as they move from a pull-out to a cluster model of service provision for gifted and talented and high-achieving students. One aspect of this practice is teaching teachers to do pre-assessments, allowing for curriculum compacting for students who already know the content and providing students opportunities to move more quickly into advanced content.

The district's content specialists can serve as a bridge from central office to the schools, disseminating information to staff who work in each area and also providing an additional layer of oversight that central office directors typically would not have the resources to provide. Some area-specific strategies and supports provided by specialists are described next.

CORE CONTENT AREAS

The district employs seven content specialists in the core areas. There are two each in ELA-reading, mathematics, and science, and one in social studies who is K–12. In the areas with two content specialists, one is responsible for elementary and the other for secondary. As indicated by the data presented in this chapter, WISD student performance in all content areas warrants attention. These core area content area specialists can support the implementation of innovative instructional strategies identified as part of the district's improvement processes. As an example, one restructuring initiative under consideration involves departmentalizing starting at the fourth grade level. Content specialists will be essential in putting such a structure in place by providing the necessary job-embedded learning teachers will need to change from generalist teaching across all subjects to specific subject-area teaching.

BIL/ESL

Enrollment of LEP students in the district has grown from 10 percent of the student population in 2001–02 to 17 percent in 2010–11. According to 2011 Performance Based Monitoring Analysis System (PBMAS), performance of WISD bilingual education (BIL) and limited English proficient (LEP) students generally exceeds state PBMAS standards. However, in 2010–11, the district received two performance level indicators above zero for LEP students—one for the ESL English Texas Assessment of Knowledge and Skills (TAKS) passing rate in science and the other for LEP graduation rate, meaning that these areas did not meet the PBMAS standard.

Prior to school year 2011–12, the structure of the BIL/ESL department consisted of a director and a secretary. In 2011–12, the district added three content specialist positions, allowing the department to expand its focus from compliance to quality instructional support. The content specialists can provide an expanded understanding of student, teacher, and campus needs, which will help guide district decision-making, including resource allocation in this student service area. As this student population continues to grow, the role of these staff members will become increasingly important districtwide.

RtI

With the goals of preventing future failure and promoting student success, RtI is a proactive approach to meet student needs before or as learners first begin to struggle. RtI includes three levels of intervention, each with increasing intensity. Tier 1 includes high quality core instruction. Tier 2 includes evidence-based intervention(s) of moderate intensity. Tier 3 includes individualized intervention(s) of increased intensity for students who show minimal response to secondary interventions. At all levels, attention should be on fidelity of implementation, with consideration for cultural and linguistic responsiveness and recognition of student strengths.

In school year 2011–12, the district created two new RtI specialist positions. These staff members were charged with creating a new intervention plan for the district. The district's previous Student Assistance Team plan included 16 pages of forms for staff to fill out. The new specialists have redesigned the forms into a two-page electronic format so teachers can implement the process more easily. The specialists are also focused on strengthening Tier 1 interventions and teacher understanding of what quality instruction looks like in the classroom, hopefully reducing the need for Tiers 2 and 3. They have already provided training for principals, counselors, and campus instructional specialists. The next area of focus will be to provide training for department and grade-level chairs and then teaching the staff at faculty meetings. The specialists have also provided training to district leaders and other staff to ensure that quality RtI processes are integrated into district improvement processes.

ADVANCED ACADEMICS

District Commended level performance lags behind state averages, indicating a need for a focus on advanced academics. While the district's curriculum, CSCOPE, provides performance standards aligned with the TEKS, it lacks the depth, complexity, and differentiation for supporting

advanced academic goals. In 2011–12, the district hired three advanced academics content specialists who are currently working to help teachers add depth and flexibility for gifted and talented (G/T) and academically advanced students at the elementary level and to generally add rigor to instruction across the board at the secondary level.

The need for these specialists is further reinforced by district administrators who stress the need for differentiation. The typical model of instruction in the district has been "stand and deliver." The advanced academics specialists are giving teachers the tools they need to manage a different kind of classroom in which students are more self-directed. Support for teachers' learning to manage a student-centered environment requires a different kind of planning in which considerations for each group of learners are identified for every lesson. The advanced academics content specialists, by their training and experience, are well suited to helping teachers learn this kind of lesson planning, classroom management, and instructional delivery.

INSTRUCTIONAL TECHNOLOGY (IT)

Staff reported that the district has not provided adequate instructional support for technology on campuses for some time, so in 2011–12, the district refocused the efforts of the two instructional technology specialists to provide teacher training and support in the use of district software and systems, including the grading system, the credit recovery system, and Eduphoria, including the Professional Development and Appraisal System (PDAS) portion. Instructional technology content specialists can also train teachers in the use of technology for a variety of instructional purposes. Further, as the district moves forward in its efforts to better serve its students, these content specialists will play essential roles in helping staff learn to use data to diagnose the needs of schools, educators, and students.

DETAILED FINDINGS

STUDENT PERFORMANCE (REC. 5)

WISD does not have appropriate organizational structures in place to support adequate educational services so that all students have the opportunity to succeed.

Students in WISD exhibit a wide range of performance levels. In general, district performance is below state and regional averages. In school year 2010–11, 61 percent of WISD students passed all the TAKS tests, compared to 74 percent of students in Regional Education Service Center XII (Region 12) and 76 percent of students statewide.

In all content areas, performance of WISD students overall and for the African American and Hispanic student groups was consistently below state and regional averages. WISD White students performed at or above state and regional averages in all subject areas. **Exhibit 2–1** shows TAKS Met 2011 Standard (Sum of All Grades Tested).

Differences in WISD performance are greater when student group performance is compared to state averages of similar student groups. **Exhibit 2–2** illustrates how WISD African American, Hispanic, and White students performed compared to the state averages for the African American, Hispanic, and White student groups. While WISD White students performed above state and regional averages for all students, they were at or below state averages for White students in all subject areas and all tests.

EXHIBIT 2–1
TAKS PERFORMANCE BY STATE, REGION, DISTRICT, AND DISTRICT STUDENT GROUP
2010–11

SUBJECT	STATE	REGION	WISD OVERALL	WISD AFRICAN AMERICAN	WISD HISPANIC	WISD WHITE
Reading/ELA	90%	89%	**83%**	**79%**	**84%**	93%
Mathematics	84%	82%	**73%**	**64%**	**76%**	85%
Writing	92%	90%	**89%**	**87%**	**89%**	94%
Science	83%	82%	**67%**	**57%**	**69%**	85%
Soc Studies	95%	94%	**91%**	**86%**	**92%**	95%
All Tests	76%	74%	**61%**	**51%**	**63%**	80%

NOTE: The numbers in **bold** show the areas in which WISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, Academic Excellence Indicator System (AEIS) district report, 2010–11.

EXHIBIT 2–2
TAKS PERFORMANCE BY STATE AND DISTRICT STUDENT GROUP
2010–11

SUBJECT	STATE AFRICAN AMERICAN	WISD AFRICAN AMERICAN	STATE HISPANIC	WISD HISPANIC	STATE WHITE	WISD WHITE
Reading/ELA	86%	**79%**	87%	**84%**	95%	**93%**
Mathematics	75%	**64%**	81%	**76%**	91%	**85%**
Writing	89%	**87%**	91%	**89%**	94%	94%
Science	74%	**57%**	78%	**69%**	92%	**85%**
Soc Studies	92%	**86%**	94%	**92%**	98%	**95%**
All Tests	65%	**51%**	71%	**63%**	86%	**80%**

NOTE: The numbers in **bold** show the areas in which WISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2010–11.

Also informative is an examination of the performance gap between WISD White and African American students and WISD White and Hispanic students. Over the most recent four-year period (school year 2007–08 to 2010–11), White students in the district consistently outperformed students in both other groups with a difference as large as 29 percentage points between White and African American student performance on all tests in 2010–11. These achievement gaps have remained relatively consistent over the last four years, though in science there has been a decrease of 6 percentage points. Gaps in performance between the White and African American student groups in WISD are consistently larger than performance gaps for similar comparison groups at the state level. Gaps between WISD White and Hispanic students are comparable to gaps between these groups statewide. **Exhibit 2–3** shows the performance gaps between White students and African American and Hispanic students in WISD and in the state.

WISD special education, economically disadvantaged, limited English proficient (LEP), and at-risk student groups also perform below state averages when compared to similar groups. **Exhibit 2–4** displays the differences in performance on all tests between these WISD student groups and state averages for similar groups in 2010–11.

In terms of its high performing students, WISD averages are also below both state and regional averages. **Exhibit 2–5** shows WISD student Commended Performance compared to state and regional averages.

In addition, WISD students generally do not approach state averages on most of the state-reported College Readiness Indicators in the Academic Excellence Indicator System (AEIS). One exception is Advanced Course/Dual Enrollment Completion, for which the district received a Gold Performance Acknowledgement in 2010–11. However, central office staff attributed this result primarily to student participation in non-academic dual credit courses through the district's Career and Technical Education (CTE) programming. Staff reported that WISD students earned 1600 hours of college credit in 2010–11 in CTE courses such as automotive repair, cosmetology, graphic design, animation, and business through articulation agreements with Texas State Technical College and McLennan County Community College. Another exception is the number of students graduating under the Recommended High School Program (RHSP) and Distinguished Achievement Program (DAP) for the Hispanic, White, special education, economically disadvantaged, LEP, and at-risk student groups. Across other performance indicators, only WISD White students approach or exceed overall state averages, though WISD White student averages were typically below state averages for similar students. **Exhibit 2–6** displays performance of WISD students compared to state averages on college readiness indicators.

At the campus level, performance varies greatly by school as indicated by accountability ratings. In 2010–11, eight schools were rated *Academically Unacceptable*, most of them at the secondary levels. However, 11 of the district's 19 elementary schools are *Recognized or Exemplary*. The discrepancy in performance between the district's elementary and secondary schools points to a breakdown in the district's systems. **Exhibit 2–7** illustrates the wide range of performance across WISD campuses.

In the district's current organizational structure, the assistant superintendent for Curriculum, Instruction, and Assessment

EXHIBIT 2–3
TAKS PERFORMANCE DIFFERENCES BETWEEN STUDENT GROUPS WITHIN THE DISTRICT AND STATE
2007–08 TO 2010–11

	DIFFERENCE: WISD WHITE AND AFRICAN AMERICAN STUDENT GROUPS	DIFFERENCE: STATE WHITE AND AFRICAN AMERICAN STUDENT GROUPS	DIFFERENCE: WISD WHITE AND HISPANIC STUDENT GROUPS	DIFFERENCE: STATE WHITE AND HISPANIC STUDENT GROUPS
READING/ELA				
2007–08	**14%**	9%	9%	9%
2008–09	**11%**	8%	7%	8%
2009–10	**14%**	9%	**10%**	9%
2010–11	**14%**	9%	**9%**	8%
MATHEMATICS				
2007–08	**22%**	20%	11%	14%
2008–09	**21%**	19%	11%	12%
2009–10	**20%**	17%	6%	10%
2010–11	**21%**	16%	9%	10%
SCIENCE				
2007–08	**34%**	26%	**22%**	21%
2008–09	**33%**	23%	19%	19%
2009–10	**26%**	17%	14%	14%
2010–11	**28%**	18%	**16%**	14%
SOC STUDIES				
2007–08	**11%**	9%	5%	8%
2008–09	**8%**	7%	4%	7%
2009–10	5%	5%	3%	4%
2010–11	**9%**	6%	3%	4%
ALL TESTS				
2007–08	**29%**	26%	15%	19%
2008–09	**27%**	24%	15%	18%
2009–10	**26%**	21%	12%	16%
2010–11	**29%**	21%	**17%**	15%

NOTE: The numbers in **bold** show the areas in which WISD performance gaps are greater than state performance gaps.
SOURCE: Texas Education Agency, AEIS district and state reports, 2008–09 to 2010–11.

EXHIBIT 2–4
TAKS ALL TESTS PERFORMANCE BY STATE AND DISTRICT STUDENT GROUPS
2010–11

	SPECIAL EDUCATION	ECONOMICALLY DISADVANTAGED	LIMITED ENGLISH PROFICIENT	AT RISK
State	51%	68%	58%	56%
WISD	**48%**	**59%**	**54%**	**48%**

NOTE: The numbers in **bold** show the areas in which WISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports 2010–11.

EXHIBIT 2–5
TAKS COMMENDED PERFORMANCE BY STATE, REGION, AND DISTRICT
2010–11

SUBJECT	STATE	REGION	WISD
Reading/ELA	33%	30%	**21%**
Mathematics	29%	24%	**17%**

NOTE: The numbers in **bold** show the areas in which WISD students and student groups performed below state comparison groups.
SOURCE: Texas Education Agency, AEIS district report, 2010–11.

EXHIBIT 2–6
ADVANCED ACADEMIC INDICATORS BY STATE AND DISTRICT STUDENT GROUPS
2010–11

	STUDENT GROUPS*							
	ALL	AA	H	W	SP ED	ECO DIS	LEP	AR
TAKS COMMENDED PERFORMANCE ALL TESTS 2011								
State	16%	8%	11%	23%	4%	9%	7%	4%
WISD	**7%**	**4%**	**7%**	**17%**	**4%**	**6%**	**4%**	**3%**
ADVANCED COURSE/DUAL ENROLLMENT COMPLETION 2009–10								
State	26.3%	19.5%	23.0%	30.9%	6.0%	20.4%	11.6%	14.2%
WISD	63.8%	59.2%	65.0%	71.4%	47.4%	64.0%	59.5%	57.6%
ADVANCED PLACEMENT (AP)/INTERNATIONAL BACCALAUREATE (IB) RESULTS—TESTED 2010								
State	22.7%	14.5%	19.6%	25.9%	N/A	N/A	N/A	N/A
WISD	**15.7%**	**9.1%**	**16.2%**	26.8%	N/A	N/A	N/A	N/A
RECOMMENDED HIGH SCHOOL PROGRAM (RHSP)/DISTINGUISHED ACHIEVEMENT PROGRAM (DAP) GRADUATES CLASS OF 2010								
State	82.7%	76.4%	83.6%	83.0%	23.4%	80.1%	68.3%	71.0%
WISD	**81.9%**	**75.3%**	85.5%	83.5%	48.8%	82.5%	76.0%	74.2%
TEXAS SUCCESS INITIATIVE (TSI)—HIGHER EDUCATION READINESS COMPONENT—ELA 2011								
State	66%	57%	59%	77%	21%	56%	11%	46%
WISD	**52%**	**47%**	**51%**	**67%**	14%	**49%**	13%	**39%**
TEXAS SUCCESS INITIATIVE (TSI)—HIGHER EDUCATION READINESS COMPONENT—MATHEMATICS 2011								
State	69%	54%	63%	79%	23%	59%	34%	44%
WISD	**55%**	**48%**	**55%**	**66%**	**22%**	**53%**	**25%**	**38%**
SCHOLASTIC ASSESSMENT TEST (SAT)/AMERICAN COLLEGE TEST (ACT) RESULTS AT/ABOVE CRITERION—CLASS OF 2010								
State	26.9%	8.1%	12.7%	41.4%	N/A	N/A	N/A	N/A
WISD	**9.2%**	**3.2%**	**6.6%**	**29.3%**	N/A	N/A	N/A	N/A
COLLEGE-READY GRADUATES—BOTH SUBJECTS (ENG LANG ARTS AND MATHEMATICS)—CLASS OF 2010								
State	52%	34%	42%	66%	7%	38%	5%	22%
WISD	**33%**	**25%**	**34%**	**49%**	**6%**	**30%**	11%	**14%**

* AA = African American, H = Hispanic, W = White, SP ED = Special Education, ECO DIS = Economically Disadvantaged; LEP = Limited English Proficient, AR = At Risk.
NOTE: The numbers in **bold** show the areas in which WISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2010–11.

EXHIBIT 2–7
NUMBER OF WISD SCHOOLS BY ACCOUNTABILITY RATING AND SCHOOL YEAR
2007–08 TO 2010–11

		2007–08	2008–09	2009–10	2010–11
Exemplary	Exemplary	0	3	6	3
	Total	**0**	**3**	**6**	**3**
Recognized	Recognized	9	10	9	7
	Total	**9**	**10**	**9**	**7**
Academically Acceptable	Academically Acceptable	17	11	12	10
	AEA: Academically Acceptable	1	1	1	1
	Total	**18**	**12**	**13**	**11**
Academically Unacceptable	Academically Unacceptable	4	5	2	8
	AEA: Academically Unacceptable	0	0	0	0
	Total	**4**	**5**	**2**	**8**
Not Rated	AEA: Not Rated – Other	0	0	0	0
	Not Rated: Alternative Education	0	0	0	0
	Not Rated: Other	3	3	3	3
	Not Rated: Data Integrity Issues	0	0	0	0
	Total	**3**	**3**	**3**	**3**
Total WISD Schools		**34**	**33**	**33**	**32**

SOURCE: Texas Education Agency, AEIS Lonestar district report, 2010–11; District Accountability Summary, 2010–11.

(assistant superintendent) is responsible for educational services in WISD and reports directly to the superintendent. Reporting to the assistant superintendent are two executive directors, one senior director, seven directors, and two coordinators. Despite the various levels implied by these titles, all these positions are shown to be at the same level on the organizational chart, and the number and types of positions reporting to each position below the assistant superintendent varies greatly. **Exhibit 2–8** shows the current organizational structure of WISD instructional services.

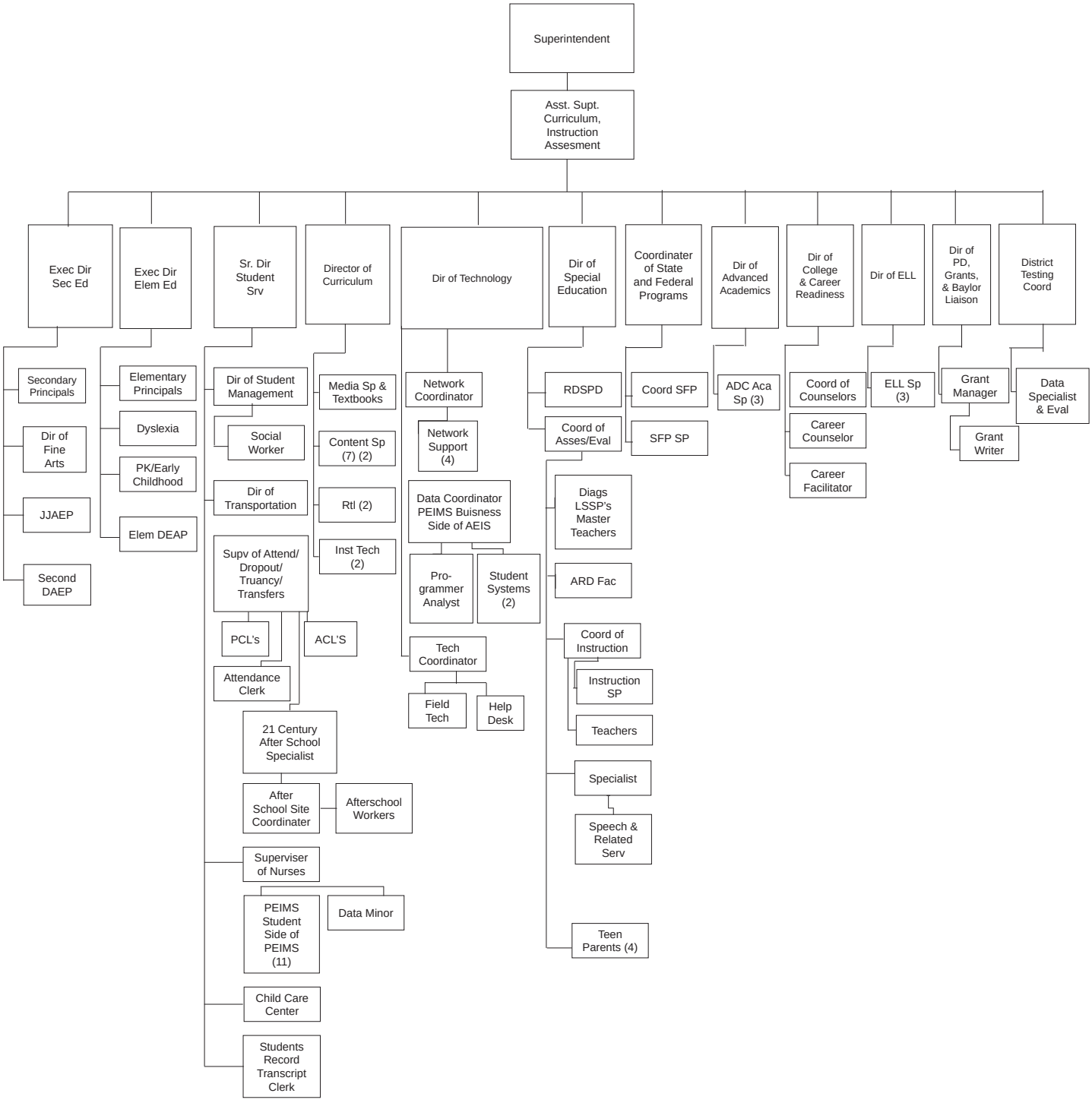
According to staff, the organization of this division has been in flux with many personnel changes. The assistant superintendent has directed much effort toward filling vacancies in key positions, including the executive director of Secondary Instruction, the director of Curriculum, the director of Advanced Academics, and the director of Special Education. Additionally, some staff members were moved to more appropriate positions within the division. Eight of the staff members directly reporting to the assistant superintendent are new either to the district or to their positions in 2011–12.

Overall, data indicated a history of ineffective and inconsistent leadership in the district. Survey data indicated that central office administrators are seen by campus staff as partially effective in providing support for schools. Teacher and other school personnel responses to the "Central administration is efficient in providing services to each campus" survey item showed a mean of 2.55 on a four-point scale, meaning that over half of those responding to the survey rated central administration as efficient. In comparison, central office personnel rated the item higher, with a mean of 2.91, indicating that central office personnel rate their service as more efficient than the staff receiving it.

A top-down leadership approach is favored by some district leaders, while other district administrators recognize the importance of districtwide collaboration, distributed leadership, and shared decision-making to make the kind of long-term changes in schools that are required in WISD. However, in some cases, according to staff, principals seem to take a "this too shall pass" position and are non-responsive to district administrators' requests for meetings.

Recently, WISD has taken a number of steps to improve district leadership with the ultimate goal of improving student performance. For example, the district hired a new superintendent as of March 2011. The superintendent indicated that her highest priority was to transform WISD

EXHIBIT 2–8
WISD INSTRUCTIONAL SERVICES ORGANIZATION
2011–12



SOURCE: WISD Administration Office.

from an underperforming district into one that is performing adequately. Key strategies to achieving that goal include hiring appropriate personnel for each position, holding each staff member accountable for doing the job they were hired to do, ensuring data quality, and making purposeful decisions about the best use of resources in the service of student learning.

Board members indicated strong support for the new superintendent with one board member citing the new superintendent as the biggest strength of the district and acknowledging her leadership in the budget cutting processes that were necessary for school year 2011–12. The board's confidence in the new superintendent was indicated by its vote to approve a $1.4 million contract with a professional development provider on her recommendation, despite the budget cuts that had to be made for 2011–12.

District leadership is also making diligent efforts to ensure that district and campus administrative positions are staffed with qualified personnel who understand that their roles are in the service of student learning. Many key positions had been vacant for long periods of time prior to school year 2011–12, and these positions are now filled by qualified personnel. In terms of existing staff, the district is making efforts to address a culture that in the past was perceived as "stifling" with disincentives to collaborate. Now, some staff reported the district is emphasizing risk-taking and collaboration.

The new superintendent also identified professional development to target specific district needs. One program focused on building staff knowledge and understanding of how to serve economically disadvantaged students, and all district staff completed a first round of training as of November 2011. Additionally, all teachers and principals were scheduled to receive training on providing and monitoring effective instruction in school year 2011–12.

The assistant superintendent for Curriculum, Instruction, and Assessment is trying to unify that division. The assistant superintendent has been meeting regularly with directors to discuss primary functions of each department, identify areas of duplication, and create a timeline of key district functions such as student scheduling. Additionally, the assistant superintendent has contracted with Dr. Bryan Cole, a recently retired faculty member from the College of Education and Human Development at Texas A&M University, to assist with district reorganization.

The impact of these changes on student performance will not be known for some time. However, the district still has numerous challenges to address.

Schools, as well as departments within central office, have historically acted in isolation as "silos," making autonomous decisions without effective communication. Consequently, staff reported that efforts were often duplicated, and lines of authority were unclear. As an example, the district sponsored two different but similar trainings for teachers on instructional differentiation sponsored by two different departments. These trainings could have been combined. Principals have also on occasion acted autonomously, making decisions for their campuses in areas such as disciplinary actions and professional development without consulting with district staff or complying with district policy.

Currently, the district is conducting audits of various departments. While looking in detail at department functionality can be a very effective strategy, the results of such audits, by nature, focus on the area being audited to the exclusion of other parts of the system and could potentially further the silo effect. Results of such audits need to be reviewed in light of the system as a whole and especially in the context of other departments that work closely with the department being audited.

Staff reported that an "us versus them" mentality has existed between central office and campuses. Staff also reported that some campus personnel play one central office administrator against another, continuing to ask questions of different persons until they get the desired answer.

In addition, teacher morale is very low. Inconsistent expectations due to changes in leadership at the district and campus level are very challenging for staff. Moreover, teachers may get conflicting messages from central office and their principals.

Communications from central office have sometimes lacked transparency. For example, while budget cuts have resulted in increased teaching loads and decreased planning time, teachers and parents do not understand why particular budget cuts were made for school year 2011–12. Cuts in special education have resulted in less time for some students who need intensive academic support.

The district's curriculum, CSCOPE, is intended to provide instructional consistency, which is especially critical given WISD's high within-district student mobility rate of 40

percent. However, teachers report inconsistent use of the curriculum across the district.

Combined, these examples indicate a high level of inefficiency and inconsistency in educational services across the district. To address district performance issues, including uneven performance across schools, the district should implement support structures at the central office level to address existing communication and culture issues and to strategically focus improvement efforts.

The new superintendent and her administration clearly have a challenge in pulling together a fragmented district into a fluid, dynamic system. This challenge also presents an opportunity, though it is made more difficult coming at a time when expenses are increasing and revenues are decreasing.

A national study of how leaders in urban school districts transformed their work and relationships with schools illustrates how central office can provide schools with quality, consistent support on teaching and learning. The findings of this study provide insights that can serve as guiding principles in reorganizing the division of Curriculum, Instruction, and Assessment.

The study emphasizes how all central office administrators should assume a stance of "stewardship," consistently communicating their commitment to real and meaningful changes in their work, articulating the roles and responsibilities that central office staff members will assume in school improvement, and strategically brokering resources and relationships in support of schools. The district should also hold schools accountable for improving their schools' performance on annual performance measures, while building capacity at every level of the system and providing schools the resources and support needed for success.

In restructuring the instructional services department, the district should consider a general guideline of supervisory responsibility (i.e., direct reporting) for six to eight positions. Though school district organizational charts vary greatly, Donna ISD, one of the peer comparison school districts identified for this review, has three direct reports to its deputy superintendent of Instruction and Administration. WISD should review and reorganize direct reporting and responsibilities associated with a more streamlined structure for the department.

WISD district leadership should also work to implement a systems approach to the organization of the Curriculum, Instruction, and Assessment division that targets and prioritizes highest need areas while eliminating departmental isolation in supporting schools. A new organizational structure for the division will promote the communication and collaboration that will ensure that students, teachers, and principals are getting the support they need. Clear lines of accountability need to be drawn, and the organization must ensure that key personnel are not overloaded and have the support for doing their jobs. Because of the history of consistent low-performance concentrated in specific schools, the district could consider organizing departments around support for vertical feeder patterns of schools. Broad Prize winning school district Aldine ISD has implemented a similar structure with a great deal of success. **Exhibit 2–9** provides an alternative organizational structure that reflects this portion of the recommendation.

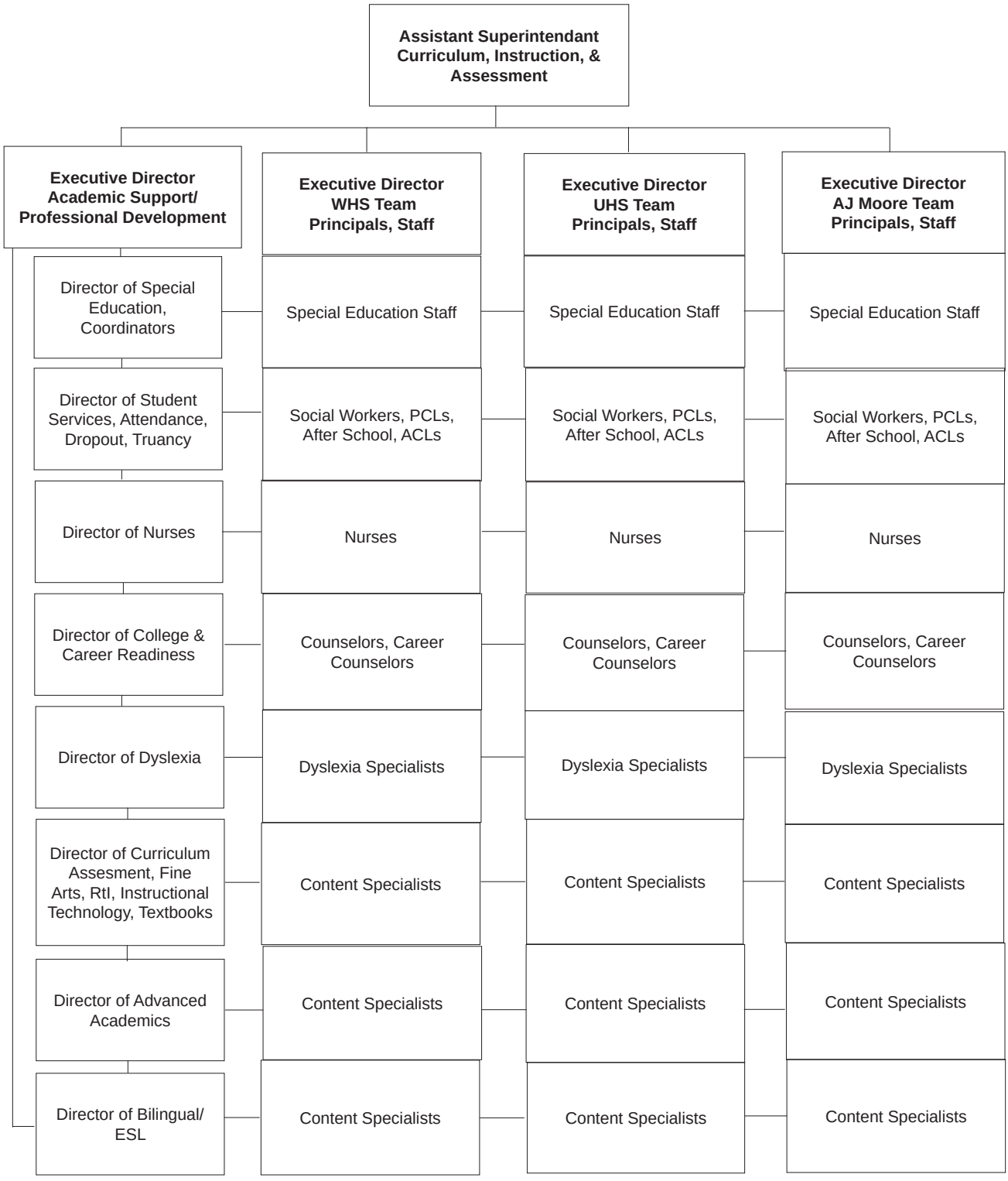
Several principles provide the foundation for this redesign. The most essential is that the redesign prioritizes the support needed to turn around the district's low-performing schools. This structure provides a vehicle for establishing a common vision for teaching and learning in WISD; clear and efficient communication structures; engagement of all stakeholders to build buy-in; the equitable distribution of resources; and the commitment of school and district leaders to success for all students.

In this model, the assistant superintendent has four direct reports, each at the executive director level. Three of the proposed executive directors have primary responsibility for a vertical feeder pattern of schools, providing principals and their staffs with dedicated and coordinated support from central office departments. The fourth executive director would supervise all the directors responsible for academic and student services support and oversee professional development.

The staff of each service area (e.g., special education, content specialist, counseling, dyslexia) would report to their departmental director but also have direct responsibility for serving the schools in their vertical cluster. For example, the departmental lead for curriculum would provide coordinated yet tailored support for content specialists who play a critical role in providing professional development for a cluster of schools. In this way, professional development is coordinated and coherent at the district level and also focused on specific campus needs.

A critical understanding to this approach is that resources would be equitably distributed based on need. For example,

EXHIBIT 2–9
RECOMMENDED WISD INSTRUCTIONAL SERVICES ORGANIZATION



SOURCE: Developed by Review Team, 2011.

Academically Unacceptable schools might have more staff and dedicated resources until their performance rises to the Acceptable level at which point more resources would become available to the team as a whole. Therefore, it benefits the entire team when *Academically Unacceptable* schools' performance improves, and all should be motivated to help. For this model to work, transparency in resource allocation is critical.

Another difference in the proposed design is to move some of the functions currently under the assistant superintendent for Curriculum, Instruction, and Assessment to the assistant superintendent for Business and Support Services. These functions could include technology, PEIMS, attendance, records/transcripts, grant writing and management, and transportation. While these functions clearly support instruction, moving them to other divisions allows the assistant superintendent for Curriculum, Instruction, and Assessment to focus on those aspects of the district's work most directly related to academic achievement of WISD's students.

To implement this recommendation, the district should consider the following implementation steps.

First, the assistant superintendent should continue to meet frequently with executive directors and departmental directors, identifying key district functions and areas of redundancy. This team's work should also be expanded to assume leadership in articulating a shared vision for turning the district around and helping to ensure that district and school leaders are speaking with one voice. When such vision statements are developed with a broad base of input, they will be conveyed persuasively and enacted enthusiastically because of the buy-in generated in the development process. The continued use of an external consultant could support this process, including facilitating a design team of key stakeholders to articulate a definition of quality learning in the district.

The definition of quality learning, the new organizational structure, and organizing principles should be broadly shared particularly with others in central office, teachers, and principals, with careful consideration given to staff responses and feedback. The team should document all of its meetings with rationale for decisions made and a summary of deliberations for all critical decision points.

The new vertical clusters of feeder pattern schools should be launched at the beginning of school year 2012–13. New teams should meet over the summer to begin discussing roles and responsibilities. Responsibilities of each central office staff member assigned to teams should be made explicit, and communication structures and contact information for each team member provided. Each vertical team should have goals, objectives, timelines, and responsible parties with visible means for tracking progress on goals and objectives. Consistent with turnaround literature, planning should include the accomplishment of desired changes at the beginning of the school year, inspiring confidence and commitment in working toward more challenging changes.

Throughout school year 2012–13, each team, as well as the executive team and the stakeholder design team, should continue to refine their plans.

This recommendation can be implemented with existing resources, with positions such as director of Student Management and director of Professional Development repurposed within the proposed structure into two new administrative positions—executive director of School Services and Professional Development, and director of Dyslexia Services.

CURRICULUM (REC. 6)

The district has implemented steps to monitor curriculum alignment but lacks consistency in curriculum implementation, resulting in learning gaps for a highly mobile student population.

WISD has a highly mobile, low socioeconomic status student population. Inconsistent implementation and monitoring of the district curriculum jeopardizes the district's ability to provide a quality learning environment for its high-needs students.

An ideal education system has a curriculum that is aligned with the assessment on which student achievement will be evaluated and provides students with the opportunity to learn that curriculum in every classroom within the system. WISD has taken steps to provide instruction based on an aligned curriculum but inconsistencies in implementation and monitoring at the district and campus levels persist.

In 2008–09, the district implemented the CSCOPE curriculum, created by Texas Education Service Center Curriculum Collaborative (TESCCC) and distributed by Region 13. CSCOPE is a comprehensive curriculum package that aligns the material to be taught with the student expectations for success in each subject across grades K–12. The intent is that if students are given the opportunity to learn the information in the curriculum, then students will

be prepared for the statewide assessment, which is based on the student expectations. Toward that goal, CSCOPE includes vertical alignment documents, a Year-at-a-Glance, instructional focus documents, exemplar lessons, and unit assessments. The vertical alignment documents detail the ways in which the curriculum builds across years so that students in each grade level are learning from the previous grade. The Year-at-a-Glance documents bundle the student expectations for each of the curricular units and lay out the sequence for presenting the information across each school year. This document is intended to ensure that all teachers in the district are generally teaching the same student expectations at around the same time, which is one of the reasons the district decided to adopt CSCOPE. Instructional focus documents list the key understandings of each unit and explain why particular student expectations are bundled for the unit. The instructional focus documents also list performance indicators that can be used to create projects that show students are meeting expectations. In addition to listing the performance indicators, there are unit assessments included to gauge student progress on the expectations of the unit.

When the curriculum was first introduced in 2008–09, it was shortly before school started, when many teachers had already done their planning over the summer. This circumstance led to some resentment among teachers, who were told to follow the curriculum exactly, including the exemplar lessons. Since that time, due to feedback from teachers about the gap between student abilities and the rigor of the lessons, implementation expectations have changed. Teachers are now asked to follow the Year at a Glance and the instructional focus documents but are no longer required to implement the exemplar lessons or unit assessments. However, it is widely acknowledged across the district that the level to which even these expectations are followed depends on campus leadership.

With such a highly mobile population, it is imperative that teachers across the district understand the importance of consistent curriculum implementation. WISD has already initiated steps to provide a system of support for teachers and principals focused on improving student achievement. In the summer of 2011, content specialists and instructional specialists met to create formative assessments that teachers could use to gather information on student progress toward state expectations. Classroom teachers are now involved in the assessment writing process as well.

In 2010–11, the district was administering progress examinations every six weeks but found the process was insufficient to monitor how well students were learning the material required to pass the annual state assessment. The district has now implemented a system in which campuses test all students in a grade level on a particular set of standards that has been the focus of the previous three weeks of instruction. These three-week "checkpoints" are short, 5-10 question assessments that target the specific standards that should have been addressed. Administrators are working with teachers to ensure that follow-up based on checkpoint data includes ways of grouping students who did not pass the checkpoint so that reteaching can occur in a timely and effective way. These assessments also help teachers adhere to the sequence of instruction recommended in the curriculum.

Three-week checkpoints and district-based benchmark assessments are being created to align the district's CSCOPE curriculum with the objectives of the new statewide assessments that will be administered in the spring, the State of Texas Assessments of Academic Readiness (STAAR) and high school end-of-course (EOC) tests. As the new STAAR and EOC tests are reported to be more rigorous, monitoring student progress will be an important strategy to prepare for and increase district success on the assessments.

WISD should work with Region 12 to consistently implement the CSCOPE curriculum districtwide. The service center can provide professional development for all teachers and administrators in the district regarding the linkage between statewide assessments, curriculum, and opportunity to learn. Professional development can also reinforce the reasons for each of the pieces of the curriculum and why correct implementation of each is important. The value of all teachers being on the same page must be emphasized, but teachers must also be provided with information about how the three-week checkpoints and district based assessments are aligned with the timing of the curriculum and what to do with the data provided by those assessments to reteach students who don't grasp the information presented in a curricular unit. This professional development can also assist teachers in scaffolding instruction so they can use the more rigorous exemplar lessons included in the curriculum.

The district is heading in the right direction with its renewed focus on the curriculum, including the use of district-developed assessments to guide implementation and monitoring. Coordinated professional development for all

administrators and teachers would support increased consistency in curricular implementation.

This recommendation can be implemented with existing resources, with the district using its professional development budget and current contracts with Region 12 to provide CSCOPE training districtwide.

READING (REC. 7)

WISD lacks a coherent, systemic instructional program in reading, especially at the high school level.

As stated earlier in this chapter, WISD missed AYP in reading (performance) and mathematics (performance) in its Preliminary 2011 AYP Results. Because the district did not meet AYP for four years in the same indicator, it must comply with Stage 3 School Improvement Program Requirements as well as District Improvement Plan requirements. Of its 31 AYP evaluated campuses, seven missed AYP for reading, including Cesar Chavez Middle School, which is at stage 2 for reading (performance), meaning that it is a Title I, Part A campus that has missed AYP for the same indicator for the third consecutive year. As such, the campus and district must meet significant requirements. Note that while mathematics performance is also an AYP concern, this finding is focused solely on reading due to recent budget cuts that impacted reading programming, the district's lack of a developmental course sequence for reading in high school, and the impact poor reading skills have on a student's overall academic success.

During interviews, staff members expressed strong concerns about reading programming in the district. Numerous staff members reported that the need to address student reading levels is critical, stating that many students are a year or two below grade level. Other staff members noted that the students with reading problems were often the ones causing discipline problems. There was a consensus among staff members that reading skills are critical for success in other academic areas. Many staff expressed the desire to provide remediation but often cited large classes as preventing individuals from getting the help they needed. Staff expressed concern that recent budget cuts have severely impacted reading instruction in WISD, particularly at the secondary level.

Reductions in staffing have impacted the reading programming severely. The district previously had a dyslexia teacher on every campus, but the number of dyslexia teachers in the district was reduced due to budget cuts. The district employs six dyslexia specialists who serve four campuses a day under the direction of the executive director for Elementary Education. These staff members work directly with students all day, meeting afterschool for Section 504 placements.

The end of the district's Reading First grant also resulted in the loss of additional reading interventionist staff previously supported through the grant. Additionally, the district also supports instructional specialist positions at each school, but the curricular areas each of these staff specializes in varies from school to school, and many instructional specialist positions, some of which were focused on reading, were cut for school year 2011–12. Finally, a number of reading teaching positions were cut, including one at the Juvenile Justice Alternative Education Program (JJAEP).

Traditionally, each elementary campus in the district has chosen its own reading program with the result that middle schools receive students who have been taught reading using a variety of approaches. Middle schools have reading classes, but the classes are very large, with up to 35 students per class. This lack of coherence at the elementary level has significant consequences for secondary reading instruction. The high mobility of WISD students exacerbates the issue.

At the high school level, mathematics has a clearly designated course sequence in each of the state's high school graduation plans, while reading courses are not required. TEKS are provided for Reading I, II, and III as electives only. The lack of a state-required course sequence in reading for those students who need additional reading support puts the onus on school districts to determine how to serve high school students struggling in reading. Though reading courses are shown as an option in the district's High School Educational Planning Guide and Course Catalog: Targeting Your Future: 2012–13, staff report that reading courses are not offered, except for students who are English language learners (ELL) or who receive special education services. The courses that do exist are solely designed for passing the TAKS and are not developmental reading courses. The most common model for teaching reading at the high school level is through the English language arts (ELA) class, but as one staff member stated: "That is not adequate for students with reading problems. There are so many reading below level."

WISD has two content area specialists in reading—one for elementary and one for secondary. The content specialists meet with groups of teachers during planning periods, assist with lesson planning, model guided reading, and provide in-

classroom support for teachers as they implement new strategies. The district also has two RtI specialists, one for elementary and one for secondary. The RtI specialists have streamlined the district's referral system and are systematically providing training to campus staff. All of these content specialists report to the Director of Curriculum.

The district has a volunteer-based program to support reading instruction in WISD through a partnership with Baylor University. Additionally, Americorps and other local organizations provide reading volunteers. While numerous staff members expressed how much they value the volunteers, their effectiveness is not clear, nor do the volunteers adequately supplement for qualified reading staff.

The district has implemented a number of primarily, computer-based programs to provide supplemental reading support. These programs include the following:

- Grand Central Station;
- Accelerated Reader;
- Sustained Silent Reading;
- Reading Coach; and
- Lexia.

During the review team's onsite visit, WISD was applying for a Texas Literacy Initiative (TLI) Striving Readers grant from TEA. While they did not get the grant, the district purchased the grant-required reading screener that can be used for K–12 and will be used on each campus. A universal screener is an efficient way of identifying students who are at risk of reading failure. The use of the universal screener, along with new processes to track student data in Eduphoria to implement more timely interventions, are cornerstones of the district's RtI system to support reading performance improvements. Teams of teachers and principals are also looking at referrals to special education and coming up with common understandings of interventions.

However, if the district does not re-evaluate staffing and budget resources to support reading programming to provide viable alternatives, particularly at the secondary level, it is likely that many WISD students will not read on grade level and that performance at schools that are currently not meeting AYP will not improve.

RtI reflects best practice in assisting struggling readers by providing a multi-tier, prevention-focused instructional delivery approach designed to improve students' skills through high-quality instruction, early intervention, allocation of resources based on student needs, and distinguishing between students whose reading difficulties stem from experiential and instructional deficits as opposed to a learning disability. Some models also use screeners to track student progress before providing interventions. Whatever approach the district uses, the criteria for determining need for interventions and agreement on what consists of intervention is critical.

WISD should continue the efforts it has started to institute a Response to Intervention model districtwide, extending its implementation beyond elementary to secondary school levels, including high school.

Because RtI is often thought of as a strategy for elementary school, there are a number of considerations the district should review related to implementing RtI at the high school level. A step-by-step approach can result in smooth, consistent implementation:

- The district should continue developing its process to systematically establish reading screening/identification and monitoring procedures for students K–12, with special emphasis at the high school level, where no processes are currently in place. Screeners should not only be used for initial identification, but also to monitor student progress over time. Such assessments in high school need to be fine grained enough to help educators determine whether a student's difficulties are related to content, language, or cognitive abilities.
- The district should continue identifying appropriate interventions of two types—isolating specific reading skills as well as integrating them across subjects that are age and developmentally appropriate. Fidelity of interventions also needs to be addressed with usage monitored for consistency and integrity. Adapting elementary level materials and tools will likely not be successful. Considerations for English language learners should also be taken into account.
- WISD should consider implementation issues unique to high schools, including program structure, such as timelines, flexibility, and cultural responsiveness. RtI has its roots in elementary schools and early prevention. In high schools, students identified as having reading challenges also have graduation requirements, inflexible schedules, extracurricular and/or family demands, so providing interventions

requires more flexibility and creativity for high school staffs.

- WISD should continue to support teachers in meeting new challenges and ensure that they are prepared for their roles in providing interventions. Teachers and other school staff will need to collaborate to accurately identify the three primary types of students who might require tiered reading interventions—those students with mild learning disabilities, those students who are ELLs, and students in the general population who have become skilled in hiding their reading disabilities. Specific roles and identification processes for general education, special education, ESL teachers, and content specialists will need to be stated specifically and clearly understood. The recommended vertical team structure should support more coherent vertical alignment in reading programming, reading interventions, and district processes across campus feeder patterns.
- The district should ensure structural supports for professional collaboration. High schools present a unique challenge because of their departmental structures so teams of educators need time within the school day to review student progress and discuss intervention strategies across departments. Teaching staff need to understand that teachers in all content areas are responsible for identifying and monitoring student reading progress as a factor for success across subjects.
- The district should provide professional development for teachers at the high school level that includes an introduction to RtI, assessment processes, intervention strategies, effective teaching strategies, best practices for monitoring student progress, interpreting assessment data, and using data to inform instructional interventions. High school teachers in all subject areas need professional development in differentiated instructional techniques that could address reading deficiencies.
- The district should expand parent communication, a key to the successful implementation of RtI. High schools using RtI need to go beyond customary approaches of one-way parent communication and find meaningful ways to engage parents in dialogue about their children's learning.

To implement this recommendation, WISD can use existing resources in its RtI specialists and content specialists in reading.

PROFESSIONAL DEVELOPMENT (REC. 8)

WISD does not have a systematic professional development plan in place.

During interviews with the review team, numerous staff members reported that WISD offers substantial professional development opportunities. Historically, the district has had extensive expenditures in professional development; however, there has been minimal coordination and accountability and no evaluation or assessment of impacts.

Different student services departments (such as special education or bilingual/ESL) coordinate their own professional development without communication with other departments even when topics overlap. As a result, in addition to a lack of efficiency, there are concerns that all staff members are not being provided the same information. In addition, there is no follow-up to professional development or assessment of implementation fidelity. Thus, training may be well applied in some schools and not at all in other schools.

The problem in the district is not a lack of resources for professional development or a failure of support at the district level, but rather that there is not a system for ensuring that professional development efforts result in teacher growth and development. Not only does this method waste money and time, but it undermines the district's overall effort to improve student achievement.

For example, in summer 2011, the superintendent required all teachers to attend training on working with students from poverty. Given that 86.7 percent of WISD students are economically disadvantaged, professional development in topics that provide teachers with a better understanding of students' backgrounds and research-based strategies for meeting their needs should be an ongoing district goal. There are additional topics, such as use of student data to plan instruction that are also essential for all teachers; however, to date, professional development in this area has not been delivered systematically across the district.

Another area the district has not focused on is professional development for staff in areas such as bilingual or special education. While all staff should be provided basic training in these areas, organized professional development delivered by each department can help ensure that teachers are staying current in their field.

Additionally, there is currently no way to tailor appropriate training with teacher experience, such as a tiered approach to training in which veteran teachers may require less support in some areas. For example, the Lead Your Schools training in delivering content currently required by the district may be appropriate for beginning but is likely redundant for more experienced teachers.

In addition, regardless of what professional development sessions teachers attend, it is essential that there be follow-up to ensure implementation. Teachers who did report there was some level of follow-up on professional development on their campuses said that it was primarily reinforced through mention during morning announcements or through materials posted in hallways. Some administrators reported seeing it as their responsibility to ensure that teachers were implementing the training they received, but this view varied across the district. One campus administrator said he/she did not "know how much teachers remember."

Lack of coordination also means that there could be more cost-effective ways to offer professional development that is aligned to the district's goals and vision. For instance, many teachers travel to attend professional development sessions that could be presented in the district. Region 12 and Baylor University are two local potential providers that could be used to offer district-tailored training for large numbers of teachers. This change could potentially represent a cost savings for the district as well as another way to communicate the district's commitment to its strategic plan and goals and objectives for improvement, ensuring that all teachers receive the same training on a specific district-endorsed strategy. Using a train the trainers approach to offer other training aligned with key district goals can also be more cost effective, while building internal capacity, not only for delivery but for follow-up and monitoring.

The Round Rock Independent School District (RRISD) publishes a professional development policy that outlines the district's philosophy on professional development and sets overarching goals for the district. The district policy states that:

- While some professional development is delivered at the district level, most is campus based and embedded in teachers' daily work;
- District and campus professional development must be based on clearly defined expectations for curriculum and instructional best practices;
- Expectations should drive professional development and be monitored and supported at the campus and district levels;
- Professional development must be differentiated for the varying needs of educators; and
- Follow-up support must be embedded into all professional development so that educators have the support they need.

WISD should develop a coordinated district professional development plan to ensure that all teachers receive certain trainings focused on key district goals. As part of this process, the district could develop and implement a plan that incorporates the RRISD principles, provides differentiated learning opportunities for staff based on individual teacher and student need, and that is aligned with stated goals, objectives, and indicators of success. The district's director of Professional Development has begun development of such a plan. Once it is developed, the director should oversee implementation to ensure that it is systemic and strategic. The district plan for professional development should detail district priorities and expectations for professional development. Based on length of experience and teaching position, instructional staff would be required to attend certain types of clearly identified professional development. It is also incumbent on campus administrators to work with district professional development staff to discuss campus-specific needs and design necessary training. While each campus will have different needs, coordination through the district can often result in combined trainings for staff from more than one campus in order to achieve the best experiences for the lowest cost.

In addition, the director of Professional Development should be responsible for monitoring implementation of professional development experiences. Follow-up should consist of surveys to determine educator perception of training effectiveness, observations of teacher implementation to determine implementation fidelity, and data monitoring to gauge any effects on student outcomes.

This recommendation can be implemented with existing resources and could result in potential cost savings if travel expenses for staff can be reduced.

SPECIAL EDUCATION (REC. 9)

The administration of special education services is not aligned with the general education program, contributing to inaccurate identification of students for services,

inappropriate testing, and high discipline rates for special education students. In addition, WISD students are not being provided with special education services in ways mandated by the federal government and monitored by the State of Texas.

WISD has a long history of concerns related to provision of special education services. Analysis of performance levels in the Performance Based Monitoring Analysis System (PBMAS) shows some alarming trends, with PBMAS performance indicators ranging from 0 (met standard) to 3 (farthest from standard). A district that fully met standards would have an indicator of 0 in each of the categories examined through the PBMAS. Some categories include: representation in special education services (SPED Representation); discretionary placements to the disciplinary alternative education program (DAEP), in-school suspension (ISS) and out-of-school suspension (OSS); participation rates for the Texas Assessment of Knowledge and Skills (TAKS); least restrictive environment (LRE); and annual dropout rate. **Exhibit 2–10** and **Exhibit 2–11** show, from school year 2006–07 to 2010–11, that WISD rarely met the standard in any special education service provision category.

In all service provision areas except SPED representation, the district does not provide adequate services to students, with a downward trend from year to year indicating a decline in services. While the district has lowered the level of over-identification of students needing special education services, it still disproportionately identifies African American students for services, disproportionately places students receiving special education services into disciplinary environments, fails to place middle and high school students in the least restrictive environments, inappropriately tests many students identified for special education services, and loses too many special education students through dropping out.

In addition to over-identifying students for special education services and African American students in particular, the

EXHIBIT 2–10
DISTRICT PERFORMANCE INDICATORS IN PBMAS
2006–07 TO 2010–11

SCHOOL YEAR	SPED REPRESENTATION	SPED AA REPRESENTATION	SPED DISCRETIONARY DAEP PLACEMENTS	SPED DISCRETIONARY PLACEMENTS TO ISS	SPED DISCRETIONARY PLACEMENTS TO OSS
2010–11	1	2	2	3	3
2009–10	1	2	2	3	3
2008–09	1	2	2	3	N/A
2007–08	1	2	2	3	N/A
2006–07	2	2	2	2	N/A

NOTE: n/a indicates Not Assigned.
SOURCE: Texas Education Agency, Performance Based Monitoring Analysis System (PBMAS), 2006–07 to 2010–11.

EXHIBIT 2–11
DISTRICT PERFORMANCE INDICATORS IN PBMAS
2006–07 TO 2010–11

SCHOOL YEAR	SPED TAKS ACCOM PARTICIPATION RATE	SPED TAKS M PARTICIPATION RATE	SPED LRE AGES 12–21	SPED ANNUAL DROPOUT RATE (GRADES 7–12)
2010–11	2	2	2	2
2009–10	2	2	1	1
2008–09	1	N/A	0 RI*	1
2007–08	0	N/A	0	1
2006–07	N/A	N/A	0 RI*	2

*An indicator which includes RI means that the indicator was not earned directly through current year performance but was calculated based on progress from the previous year leading to achievement of the performance indicator within the number of years specified by the state
NOTE: n/a indicates Not Assigned.
SOURCE: Texas Education Agency, PBMAS, 2006–07 to 2010–11.

district under-identifies Hispanic and LEP students. The proportion of students of any background who are identified as special education should be roughly the same as the proportion of those students who are reflected in the student body overall, and there are significant differences for those groups indicating that there are probably students in need of services who are not receiving them. While PBMAS does not flag districts for these discrepancies, it is further indication of an overall problem within the district in terms of the special education identification processes.

Students in WISD are provided special education services through either inclusion services within the general education classroom or in life skills (self-contained) classes. Because of the district's performance in PBMAS, WISD has been flagged for intervention by the Program Monitoring and Interventions (PMI) division of TEA. In school year 2009–10, the district was at the Stage 3 Intervention level due to compliance issues with laws related to administering special education services and required to work with TEA officials to devise a plan for moving the district into compliance with state and federal regulations.

Data indicated a significant "disconnect" between district staff, who realize the serious implications of the lack of compliance, and campus staff, who are charged with implementing the changes being made, and campus administrators, who expressed concern that there were not clear expectations and guidelines for providing special education services. Special education staff also reported that the students receiving special education services are seen by general education staff as "your kids" rather than "our kids." Inclusion services require that a certified special education teacher or aide be present in the general education classroom to co-teach or assist in providing services aligned with the students' individualized education programs (IEPs), but campuses are not scheduling secondary students in a way that allows for adequate provision of inclusion services for students who are supposed to receive them. Students should be grouped, or clustered, for inclusion, but because students are not clustered in their classes, one inclusion teacher may be attempting to assist three students in three different classes during the same period.

Teachers also reported that the number of inclusion teachers was reduced for 2011–12. Following the review team's onsite visit, district staff indicated that school year 2011–12 staffing of inclusion teachers was based on campus needs, and that some campuses have more inclusion staff this year than in previous school years. Data shows that the district went from 721.7 general education teachers in school year 2009–10 to 823 in 2010–11. In the same time period, special education teachers dropped from 105 to 96 while the population of students requiring special education services rose from 1,551 to 1,593. While PBMAS reports show clearly that students are being over-identified, in the current situation, those students who are identified are not able to receive the services they need.

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

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

WISD should develop and implement a plan to ensure that all staff understand and feel responsible for addressing the needs of students receiving special education services. Years of non-compliance and the large number of new staff members, especially in leadership roles, will require an intense effort but can be overcome with a combination of strong leadership and respect for the efforts of staff at the campus level, including activities to encourage staff buy-in of reforms.

As part of this process, the district should review and revise its plan to address students receiving special education services incorporating recommended processes from the National Center on Educational Restructuring and Inclusion. These processes include:

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

These processes should be incorporated into annual district and campus planning. As part of this process, staffing of

special education services should be examined to determine the most effective use of certified special education teachers and teaching assistants.

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

Following the compliance meeting with TEA officials mentioned previously, the district has put in place, or is putting in place, a number of monitoring and compliance procedures. Following these procedures should lead to improved provision of services. However, getting buy-in from campus administrators and teachers will take a different type of effort. There must be efforts by district administrators to work with campus administrators to understand the difficulties of and work together to implement the new procedures. Further, the district should coordinate professional development for all teachers and administrators on working with students receiving special education services. General education teachers must understand their part in educating all students. Administrators must have the information to understand the importance of scheduling students to optimize teacher capacity to provide special education services. A coherent approach to identification and intervention for students receiving special education services will also help resolve the problem of disciplinary placements. One of the steps the district can take is to disaggregate the PBMAS data to the campus level and share this information with campus staff. Although PBMAS reports are issued only at the district level, district administrators can work with campus administrators to analyze the data for their campus and help individuals to see their part in the overall district problem.

Following the review team's onsite visit, district staff indicated that WISD is in the process of addressing some of the issues highlighted within the finding. For example, the district is now requiring a review of Response to Intervention (RtI) documentation prior to referral for special education services which ensures that students are not evaluated without approval from central office staff. Additionally, the district has completed a self-assessment and district plan for inclusion with help from Stetson and Associates, an educational consulting firm. The district indicated that the firm is also assisting the district with inclusion scheduling and training and, as of April 2012, is in the process of developing a master schedule in accordance with IEPs. District staff indicated that the Stetson inclusion model will be required for use during school year 2012–13. Finally, district staff mentioned that training for special and general education teachers will be provided through online modules to support inclusion during school year 2012–13. These modules will also be used for on-going training and support.

This recommendation can be implemented with existing resources.

SUPPORT SERVICES (REC. 10)

WISD does not have adequate counseling, nursing, and library support services to meet the needs of its large economically disadvantaged and at-risk student population.

Anticipating a $3.5 million district budget shortfall in 2012–13, WISD made deep budget cuts in 2011–12. However, some cuts did not appear to adequately take into account the particular needs of the district's majority student population. In 2010–11, Academic Excellence Indicator System (AEIS) reports show 86.7 percent of WISD students received free or reduced-price lunch, compared to 59.2 percent of students statewide. In addition, 67.9 percent of students are at-risk of dropping out of school before graduation, compared to 46.3 percent statewide.

Interview data indicated that there is a sense in the district that budget cuts have made dealing with the extensive needs of the student population an overwhelming problem.

Loss of services to help ensure that all students are provided with medical assistance, counseling, anger management, and behavior modification leaves staff unsure of where to begin to help their students. Communities in Schools (CIS) is a statewide dropout prevention program adopted by the district that has been providing social workers on campuses to deal with ensuring all students have the social services they need to be able to learn. However, reductions in program funding in 2011–12 left all but four WISD schools without the staff to provide the safety net many of these students need. Further, the criteria used to determine which schools were able to retain some CIS staff were not understood by

staff, especially those campuses that lost access to CIS services.

It is unclear at the campus level how the void left by CIS should be filled. As one staff member said, "These children don't have coping skills." Another staff member said: "We expect kids coming from bad situations to make good decisions. We lack counseling services for them." Many staff feel that the counselors could or should be picking up some services previously offered through CIS, but the district has one counselor for every 450 students. The American School Counselor Association recommends a maximum ratio of 1:250. The Texas School Counselor Association, Texas Association of Secondary School Principals, and the Texas Elementary Principals and Supervisors Association have all recommended ratios of 1:350. Staff reports that elementary staffing was most affected by the recent budget cuts. Every elementary has at least a half time counselor. Secondary schools have one or two full-time counselors. At the secondary level, staff reported counselors have multiple responsibilities, such as student scheduling, leaving them unable to provide adequate counseling services for students.

Another area of budget reduction was health services for students. The district administrator responsible for district nursing services has been assigned to a full-time position on a campus in addition to supervising all of the district nurses. Twenty-four of the district's 30 school nurses are Licensed Vocational Nurses (LVN), and there are no nurses' aides. Administrators reported that LVNs are particularly hard to hire, because the district pays so little for people in that position. House Resolution 2229 of the 112th Congress was created "To make demonstration grants to eligible local educational agencies for the purpose of reducing the school nurse-to-student ratio in public elementary schools and secondary schools." The ratio to be instituted through the grants is 1:750, and with one nurse per campus, the district is above this ratio at some schools, and potentially more if consolidation of campuses occurs in the future. The district may be eligible for grants to increase counseling services at the secondary level.

This year the district also moved to having only library aides on elementary campuses. High schools and most middle schools have certified librarians but no support staff. Staff also reported that they have been told that the district will eliminate certified librarians through attrition. Elementary level staff reported that aides are pulled to do other duties on campuses and to serve as substitute teachers when necessary. This situation creates a problem when a class needs access to the library, and it is closed because the aide is doing other work. Various staff reported that the library is used like a conference room for purposes such as testing and meetings. The Standards and Guidelines for Texas School Library Programs list standards for Exemplary, Recognized, Acceptable, and Below Standard school library programs. To rate as an Acceptable program, at least one certified librarian should be assigned for schools with up to 2,000 students, and at least two should be assigned if the student population is greater. The Standards and Guidelines also require one half to two paraprofessional support positions, depending on school size. The district falls below the Acceptable standards on all campuses by having no support staff on secondary campuses, and only support staff on elementary campuses.

The reduced numbers of social workers, counselors, school nurses, and librarians provide additional stumbling blocks for students who must face a variety of challenges in both the home and school environment.

In order to provide all students the opportunity to learn, WISD must investigate new ways to work with community groups and outside agencies to help ensure that students have the basic health and educational resources necessary to support their success in school. Staff agreed that the area is "rich with resources." In fact, the Waco Community Referral Manual includes 43 pages of service providers in the Waco area. Staff reported that the main problem is communicating with parents and getting all the parties together or finding a way to provide services for children whose parents cannot provide transportation. The district should initiate a meeting of community groups and agency representatives to examine budget reductions in the district and develop recommendations for ways the district can work with the community to provide these critical services to students in need.

In addition, staff reported that the district was underreporting its expenses in the School Health and Related Services (SHARS) Medicaid reimbursement system. When that situation was recognized, the district began working with the eSHARS online system to help train staff on each campus to ensure that all reimbursable money is recovered. Staff anticipates that reimbursement this year will be much higher, and the district should consider allocating these funds into support for social services for students.

This recommendation can be implemented with existing resources.

DROPOUT PREVENTION AND RECOVERY (REC. 11)

WISD does not have adequate systems in place for dropout prevention and recovery.

WISD students (overall and in all student groups except LEP students) are dropping out of school at a higher rate than state averages. For example, the dropout rates for all WISD students and the African American student group are both more than double the state dropout rate for comparable groups. **Exhibit 2–12** displays the difference between WISD and state annual dropout rates for Grades 7–12 in school year 2009–10 for all students and for various population groups.

WISD is also significantly below state averages on other dropout-related AEIS indicators, such as Four-Year Completion Rate (Grades 9–12), Five-Year Extended Completion Rate (Grades 9–12), Completion Rate I, and Completion Rate II.

According to interviews, staff members broadly attribute the high dropout rate in part to a lack of understanding of and accountability for, those students who drop out of school—their needs, the challenges they face, and their lack of engagement. Many of the district's dropouts are also over age. One indicator that staff has not taken adequate responsibility for dropouts and potential dropouts was evidenced by the following statement from a district administrator: "Kids don't drop out. We shove them out." Additionally, staff stated that some educators did not make at-risk students and their parents feel valued and welcomed in school and did not engage these students in meaningful learning opportunities. Staff also noted future concern about cuts in pre-kindergarten programming and their potential long-term impact on student success and the dropout rate.

Existing district strategies to improve high school completion include the following. WISD employs staff members in student services who are responsible for attendance and dropout prevention, regularly visiting campuses and tracking students who have withdrawn from the district. The district also received a Suspend Your Kid to School grant that promotes Saturday school for students and their parents. The district is also working with the Governor's Office to pilot a new program that is mostly online and that provides mentoring and social work services to students. Additionally, the district is looking at overage students and how it can better serve them. For example, WISD is considering turning one of its buildings into a center for overage students.

WISD also runs an alternative campus called Students That Are Reaching Success (S.T.A.R.S.) High School, which is designed to serve at-risk and recovered dropouts, primarily through computerized credit recovery opportunities. S.T.A.R.S. Academy's operating expenditures from all funds per student for school year 2009–10 were $8,567, compared to the district cost per student of $9,043. Instructional costs per student were $5,601, compared to the district cost per student of $5,028.

In school year 2010–11, S.T.A.R.S. served 119 students in Grades 6–12. S.T.A.R.S. runs three sessions, but there is

EXHIBIT 2–12
ANNUAL DROPOUT RATES BY STATE AND DISTRICT (GRADES 7–12)
2009–10

	TOTAL	AA	H	W	SP ED	ECO DIS	LEP	AR
State	1.7%	2.7%	2.1%	0.8%	2.2%	1.4%	2.9%	2.2%
WISD	**3.8%**	**5.6%**	**3.1%**	**2.3%**	**4.2%**	**2.8%**	2.0%	**4.0%**

NOTE: The numbers in **bold** show the areas in which WISD students and student groups performed below comparison groups.
SOURCE: Texas Education Agency, AEIS state and district reports, 2010–11.

EXHIBIT 2–13
DEMOGRAPHICS BY DISTRICT AND S.T.A.R.S. HIGH SCHOOL
2010–11

	STUDENT GROUPS*									
	ALL	AA	H	W	ECO DIS	LEP	AR	DISC PLACE	MOBILITY	ATT**
WISD	15,240	31.4%	55.30%	11.2%	86.7%	17%	68%	6%	27%	94%
S.T.A.R.S.	95	21.1%	67.44%	9.5%	56.8%	4%	98%	0%	76%	80%

*AA = African American, H = Hispanic, W = White, ECO DIS = Economically Disadvantaged, LEP = Limited English Proficient, AR = At Risk, DISC PLACE = Students w/Disciplinary Placements, MOBILITY = Mobility Rate.
**ATT = Attendance Rate.
SOURCE: Texas Education Agency, AEIS campus report, 2010–11.

always a waiting list. The population of S.T.A.R.S. tends to be more Hispanic and more at-risk than the district as a whole. **Exhibit 2–13** provides a comparison of the district's overall demographics and mobility and attendance rates compared to S.T.A.R.S. High School.

The S.T.A.R.S. campus is consistently low performing on most indicators, and factors such as the high mobility rate and low attendance rate shown in **Exhibit 2–13** are likely contributors. Staff reported that the original district staff members who started the campus are no longer in the district, leaving the school without a champion or leaders committed to carrying out the school's vision. Twenty-three percent of S.T.A.R.S. students passed TAKS all tests in 2011, down from 36 percent in 2010. The percentage of students passing all tests for the district overall was 61 percent. While the annual dropout rate (Grades 7–12) for S.T.A.R.S. was 20.1 percent for 2009–10, an improvement from 25.4 percent in 2008–09, it was still dramatically higher than the district's 2009–10 dropout rate of 3.8 percent. The four-year completion rate and the five-year extended completion rate are also significantly below the district rate though S.T.A.R.S. Completion Rate II for the Class of 2010 was close to the district rate. Finally, S.T.A.R.S. students do not perform near the district average on any of the state's College Readiness Indicators.

The district's strategies to provide flexible alternatives to improve the success rates of at-risk and recovered dropout students are clearly ineffective and need to be reviewed and revamped to reflect research-based strategies in dropout prevention and recovery.

The Texas Education Agency has made a significant investment in research-based strategies implemented by hundreds of schools across the state through the agency's dropout prevention and recovery grant programs. These strategies include:

- Implementing systems, including data systems, that identify struggling students who are in need of early intervention;
- Offering learning environments that are challenging and personalized for each student and including academic support for students who are behind in school; and
- Providing mentors who serve as role models and advocates for students.

WISD should identify a systems approach to early identification of high-risk students for dropping out, implement and monitor specific prevention interventions, and develop an aggressive recovery effort based on best practice standards.

The district should implement proven strategies in serving at-risk students and overhaul its dropout prevention and recovery programming. WISD should explore systemic approaches that can be used to identify students in need of early intervention. While typical dropout prevention initiatives begin in middle school, the district should follow best practices that indicate such initiatives should really start in pre-kindergarten. Children's readiness for school is negatively correlated with families' poverty levels. With 86.7 percent of WISD students identified as economically disadvantaged, appropriate early intervention will be required to ensure that these children will develop the cognitive, linguistic, and social skills they will need for success in school. Demographers indicate that students from poverty who do not receive education before the ages of 5-6 years may never catch up. The cost of remediating the impact of poverty can result in a $3 return for every $1 invested. Follow-up studies of poor children who participate in quality early childhood education show improved academic performance, decreased rates of criminal behavior, and higher adult earnings than their peers who did not participate in early childhood education.

Developing an early warning system that tracks key indicators, including attendance, grades, and grade point average, is recommended. This early warning system can be used to identify students in need of interventions, target appropriate interventions, and monitor student progress.

As the district looks at creating its vision of quality teaching and learning, it will want to pay special attention to how at-risk students are served. For example, careful consideration should be given to transitions. There are many points in a student's educational career that are critical for success at the next level. Dropping out is the culmination of what can be a long process that begins early in some students' education when they receive messages that they do not belong or are lacking in other ways often through repeated failure to achieve academic progress.

A 2006 survey of students who had dropped out of school provides support for designing personalized learning environments to serve at-risk students. The survey found that only 35 percent of students dropped out of school because

they were failing. In fact, 81 percent of dropouts said there should be more opportunities for "real-world" learning so that students can see the connection between school and getting a job. Similarly, 81 percent of dropouts surveyed wanted better teachers, and 75 percent wanted smaller classes. Additional tutoring, summer school, and extra time with teachers were identified as opportunities that would have improved their chances of graduating, as were "increasing supervision in school" and "more classroom discipline." Finally, more than half of the dropouts surveyed said that their schools "did not do enough" to help them feel safe from violence. These data indicate that a variety of approaches are likely needed to keep potential dropouts in school.

The survey also indicated the need for close caring relationships in supporting at-risk students. Forty-one percent of dropouts surveyed reported having an adult to talk to about personal problems, and only 47 percent said the schools even bothered to contact them after they dropped out.

Finally, WISD should explore models for recovering and serving students who have already dropped out of school. Expectation Graduation—Reach Out to Dropouts Walk is an example of an effective strategy for recapturing students that was started in the city of Houston and expanded to 18 districts in the Houston area and 22 Texas cities. The program engages school staff, board members, and community members in targeted efforts to visit the homes of students who have dropped out and encourage them to come back to school. According to WISD board members, the Waco community stands ready to support the district and just needs a solid plan to get behind.

To implement this recommendation, the district should create three at-risk specialist positions who will have as their primary responsibilities, proactive strategies such as developing and monitoring an early warning system, providing instructional interventions to students who are at-risk of dropping out and their teachers, and engaging the community in mentoring and outreach efforts. Hiring three at-risk specialists would provide one for each vertical team, as show in **Exhibit 2–9** (Recommended Waco ISD Organization for Instructional Services). At-risk specialists could be supervised by the director of Student Services, Attendance, Dropout, and Truancy. The fiscal impact of creating three at-risk specialist positions is based on the average salary for professional support staff in the district, which is $51,366. Benefits for these positions are estimated to be 17 percent of the average salary or $8,732, which bring the total cost to the district for each position to be $60,098 ($51,366 + $8,732 = $60,098). The total annual cost for creation of the three positions would be $180,294 ($60,098 x 3 = $180,294).

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		2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
5.	Implement support structures at the central office level to address existing communication and culture issues and to strategically focus improvement efforts.	$0	$0	$0	$0	$0	$0	$0
6.	Work with Region 12 to consistently implement the CSCOPE curriculum districtwide.	$0	$0	$0	$0	$0	$0	$0
7.	Institute a Response to Intervention (RtI) model districtwide, extending its implementation beyond elementary to secondary school levels, including high school.	$0	$0	$0	$0	$0	$0	$0
8.	Develop a coordinated district professional development plan to ensure that all teachers receive certain trainings focused on key district goals.	$0	$0	$0	$0	$0	$0	$0
9.	Develop and implement a plan to ensure that all staff understand and feel responsible for addressing the needs of students receiving special education services.	$0	$0	$0	$0	$0	$0	$0
10.	Investigate new ways to work with community groups and outside agencies to help ensure that students have the basic health and educational resources necessary to support their success in school.	$0	$0	$0	$0	$0	$0	$0
11.	Identify a systems approach to early identification of high-risk students for dropping out, implement and monitor specific prevention interventions, and develop an aggressive recovery effort based on best practice standards.	($180,294)	($180,294)	($180,294)	($180,294)	($180,294)	($901,470)	$0
TOTALS–CHAPTER 2		**($180,294)**	**($180,294)**	**($180,294)**	**($180,294)**	**($180,294)**	**($901,470)**	**$0**

CHAPTER 3

COMMUNITY INVOLVEMENT

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 3. COMMUNITY INVOLVEMENT

Relationships with the community at large, and with parents of enrolled students, are of critical importance to any successful school district. An education system designed around local control puts school districts in the position to be responsive to the needs of their community, and it allows the community to be involved and participate to meet the needs of the students. In order to do so, effective communication is paramount.

Waco Independent School District (WISD) maintains two departments responsible for communications and community involvement. The Communications Office is the district public information and relations office. The office provides information under the Public Information Act, responding to 123 requests during school year 2010–11. The average response time was four days, with 25 percent of requests being filled on the same day that the request was made. The office also develops news and video stories showing the many achievements of its students and staff.

The Office of Development and Community Partnerships provides community outreach and fundraising services. The district has been successful engaging community partners and working with local Institutes of Higher Education, including the GEAR UP program with Baylor University, the Leadership, Education and Development (LEAD) program with the Waco Chamber of Commerce, numerous Adopt-A-School partnerships, and the Lead Empower and Promote Self-Esteem (LEAPS) program with the Junior League of Waco. WISD has an Education Foundation that raises money for district education programs with a successful annual fund-raising event titled the HEB Celebrity Cook-off, which alone raised over $60,000 in 2009–10. The community has its own Education Alliance that supports education and works together with WISD. It is clear from the sheer number of partnerships, and through communication with community members, that the Waco community supports education and WISD.

ACCOMPLISHMENT

- WISD has established effective partnerships with various organizations and leverages these relationships to reach out to parents and to the community.

FINDINGS

- The district does not have a centralized communications plan that supports the district's strategic vision, outlining objectives and communication strategies that reach target audiences with the appropriate message.
- WISD's district website is not optimally used. As a result, opportunities are missed to effectively disseminate and communicate information, particularly to parents.
- WISD has two separate communications-based departments, the Office of Development and Community Partnerships and the Communications Office, that function independently and do not align communication strategies or share resources.
- The district does not have an organized program for attracting and involving parent and community volunteers throughout the district.

RECOMMENDATIONS

- **Recommendation 12: Develop and implement a communications planning process that aligns messages and measurable strategies to ensure effective allocation of resources.**
- **Recommendation 13: Improve the district's website to better leverage resources for dissemination of information, particularly to parents.**
- **Recommendation 14: Merge the Office of Development and Community Partnerships with the Communications Office and redistribute duties for more effective deployment of resources.**
- **Recommendation 15: Increase assistance to schools on both community volunteer and parental involvement programs by developing processes for servicing school needs that includes implementing marketing campaigns to attract and retain volunteers, tracking volunteer program success factors, and replicating successful programs in other schools.**

DETAILED ACCOMPLISHMENT

COMMUNITY RELATIONSHIPS THAT WORK

WISD has established effective partnerships with various community organizations and leverages these relationships to reach out to parents and to the community. Two particular organizations provide strong support for WISD efforts to provide a quality education for its students: The Greater Waco Education Alliance, and Parents for Public Schools – Waco Chapter. Both organizations have strong relationships with the school district's superintendent and with school board members, and are strongly engaged in improving educational opportunities in Waco.

The Greater Waco Education Alliance brings resources, supports, and relationships to WISD to assist the district in its mission to improve education and increase the involvement of parents, families, and the community. They conduct two community events each year targeting parents who do not typically get involved with schools, and are currently conducting their fourth annual summit bringing together business partners, educators, non-profits, higher education, counselors, faith-based communities, foundations, and government.

The Parents for Public Schools mission is to mobilize and empower parents to take a more active role in their children's education. Working for the district as a whole, not for an individual school, this community group works to understand systems and processes, and educates parents so that they are empowered to take action. The Waco Chapter has an active relationship with the district, and describes the district as relying on them to work with parents. They attend school board meetings, have direct contact with school board members and the superintendent, and act as a liaison between the district and the parent community.

Both groups described WISD's superintendent as accessible. The representative of The Greater Waco Education Alliance also described the superintendent as successful at developing strong relationships with community partners. The district has developed these relationships by charging the superintendent with getting out in the community, meeting its leaders, and listening to their concerns. The district also prioritizes development of community partnerships with three staff whose duties includes participation on community boards, outreach to the business community with potential partnership opportunities, and relationship management of current partnerships. By making development of community relationships an expectation for administrators and staff, WISD has strong partners in improving educational opportunities for the community.

DETAILED FINDINGS

PLAN AND MEASURE FOR EFFECTIVE COMMUNICATION STRATEGIES (REC. 12)

The district does not have a centralized communications plan that supports the district's strategic vision, outlining objectives and communication strategies that reach target audiences with the appropriate message. District messaging is more likely to be in reaction to an event than part of a developed campaign. As a result, the district risks not reaching its constituencies with the desired information or with the most effective strategies.

WISD has adopted 11 core values as shown in **Exhibit 3–1**. Two of the core values reference engagement of the community and parents in the educational process and many of the 11 are heavily dependent upon effective communications.

District planning documents also embed this vision, which include goals and strategies that are dependent upon effective communications. While the vision has a strong community involvement focus with many goals and strategies that depend heavily on effective communications, the district lacks a centralized communications plan with specific strategies to reach the intended audience with the intended message.

Though surveys of the community have been attempted in the past, the district does not have current data to inform them of the extent to which parents or the community at large has access to the internet, has smart phones, follows Twitter™ or Facebook™ feeds, participates in message boards, watches the district's cable TV channel, or relies on print materials or other media. Though a parent survey was conducted in 2010–11, these types of questions about communication were not included in that survey instrument, which focused on parent participation in various activities, measuring parent receipt and acknowledgement of school policies, and parent behaviors related to supporting their child's education. This survey was conducted through the State and Federal Programs Department as part of federal or state requirements for Title 1 recipients. As mandated by law, districts are not allowed to inject other material on such instruments.

There is currently no measurement of the success of strategies to reach specific audiences with intended messages. Although

EXHIBIT 3–1
WISD CORE VALUES
2011–12

Value Statements Comprising The District Vision
1. Waco ISD will ensure innovation and excellence in education to prepare all learners for productive engagement in a global society.
2. Waco ISD believes the active engagement of the community in the learning process and development of students contributes to student success.
3. Waco ISD believes that active parent participation and support foster student success.
4. Waco ISD values instruction that engages all learners in a continuous improvement process.
5. Waco ISD believes that recognizing and celebrating student, employee and community accomplishments promotes pride, builds self-esteem, and generates motivation for further success throughout the district.
6. Waco ISD believes higher expectations are necessary at all levels of the organization to provide educational opportunities which ensure that students are equipped to succeed in the 21st century.
7. Waco ISD values an equitable system that promotes educational opportunities for all students and a positive work environment for all employees.
8. Waco ISD believes that it is accountable to its stakeholders for academic achievement, fiscal responsibility and community involvement.
9. Waco ISD believes the 21st century learning environment must be safe and secure physically, emotionally and academically.
10. Waco ISD believes leadership development is necessary to promote innovation, excellence, personal integrity and accountability for all learners.
11. Waco ISD believes that recruiting, supporting and retaining quality employees by offering competitive compensation and leadership development opportunities promote student success.

SOURCE: WISD Vision, 2011.

there are many communication tools available to the district, there is a risk of not reaching constituencies or matching resources to the most effective strategies. **Exhibit 3–2** presents the varied methods and responsible departments for each of the district's outreach efforts, and highlights this lack of coordination and planning.

Although 55 percent of the district's student population is Hispanic, and with many parents speaking predominantly Spanish, the district has recently hired a part-time translator, and hopes to secure funding to extend this position to full-time in the near future. District communication materials are not typically available in Spanish, according to the Director of Communications, and programming on the district's TV station is not provided in both Spanish and English.

The district maintains a Facebook™ page to communicate positive stories about student accomplishments, post photos of activities, and share events. The primary use of social media, thus far, appears to be marketing-based, such as soliciting feedback for board agendas and fundraising, in addition to positive stories shared about student accomplishments. However, there is no monitoring of district or school mentions, postings, or blogs to measure how district messages are being received. Staff does not monitor for employee messages that convey district positions those individuals are not authorized to represent.

Though the Director of Communications has a high level of access to district issues and concerns through his involvement in the Emergency Operations committee (which oversees the district response to crises) and through the Superintendent's cabinet, his position assists district initiatives with press releases and web news, but does not provide strategic guidance on developing effective communication strategies. Though close relationships exist between the Director of Communications and local media personalities, interviews with various stakeholders often mentioned that the district is reactive in its messaging; that they do not control media stories. Examples given included the announcement of school closures not presented in context of the strategic plan, and a school fight that became a big media story and tarnished the district's image. The lack of a centralized communications plan linking district goals with messaging priorities results in media coverage that can be overly negative and out of context.

EXHIBIT 3–2
PRIMARY COMMUNICATION METHODS IN USE BY WISD
2011–12

COMMUNICATION METHOD	RESPONSIBLE DEPARTMENT
District website	Communications
School websites	Communications/School-based web publishers
Teacher web pages	Communications/Principals/Teachers
CATV	Communications
Brochures	Communications
Flyers	Communications/Schools
Participation on Community Boards	Administration
Networking at community events	Communications
Attendance at neighborhood association meetings	Schools
Social media	Communications/Administration
Traditional media (Print/Television)	Communications
Direct solicitation (phone calls, email)	Schools/Communications
Automated dialers (Robocalls)	Schools/Communications

SOURCE: WISD staff interviews, November 2011.

There is little performance measurement of the district's communications functions. In the Development and Community Partnerships Department, the coordinator for Community Development and Involvement assists the Education Foundation board in setting and achieving fundraising goals, and when the Education Foundation funds a grant, the grant recipients are expected to show success for their funded program and share the information with fellow teachers. However, there is no formal process for ensuring the performance measurement occurs. For example, the coordinator does not set goals for attracting new business partnerships or increasing individual participation in school settings, although the Community Development and Involvement staff periodically survey supporters to determine which continue to be active, and maintains a count of Adopt-a-School partners. The Director of Communications does not have goals such as the number of positive stories run by local media outlets, or an increase in the number of followers of his Twitter™ feeds.

The lack of a coordinated and measured plan has reduced effectiveness of certain communications tools. For example, the district has an automated dialer functionality that calls each student's home with a pre-recorded announcement. This technology, while an effective method for reaching parents, was described as being overly-used. Because the system dials one time for each student, families with many children in the public school system can receive multiple calls in a given day. Schools use the automated dialer technology to reach parents with low-priority announcements in addition to using it for serious issues such as truancy. According to one interviewee, this communication tool has "lost its power" and parents have stopped paying attention. While this functionality is a useful way to reach out to parents, it should coordinate with other forms of communication and not be the primary communication tool for information.

As another example, the district does not successfully communicate results of parent surveys and other parent input. By not closing the feedback loop by providing the results or how the input was used, WISD has not shown the value of participation. Parents are now less willing to continue to provide their input, as was illustrated, in combination with poor communication strategies and other limitations, when an online survey was conducted for this school review, and only 32 parents responded. Marginal parent participation highlights the district's lack of effective strategies to give and receive information from an important constituency.

With over 15,000 students enrolled in WISD, approximately 87 percent are economically disadvantaged, 17 percent are limited English proficient, and 68 percent meet one or more criteria for at-risk status. With a large Hispanic student population (55 percent), and high levels of poverty within the district, communication challenges are numerous

including lack of access to information technology and language barriers. Effective communication reaches the target audience. According to the Pew Research Center, Hispanics and African Americans are more likely to access the web and email from cellular phones than the general population, but persons with online access from home computers are more engaged than those relying on a phone or online access at other locations.

Bryan ISD effectively embeds specific media strategies and measurable goals in its school improvement plans. The Anson Jones Elementary School Improvement Plan (SIP) has a goal of increasing parent and community support. The strategies include an agreement with a local Spanish radio station to provide public service announcements on the importance of getting to school on time every day, and announcing school events. The school has set a measurable target of a 10 percent reduction in tardies, and a 10 percent increase in parent contacts, increasing the likelihood that goals will be met or strategies improved until goals are met.

WISD should develop and implement a communications planning process that aligns messages and measurable strategies to ensure effective allocation of resources. The process should include periodic evaluations of currently used media as well as exploration of new media potential to reach new or underserved audiences. The district sets annual goals for budget development, which could provide a starting point for developing strategies consistent with the intended fiscal year expenditures.

The district vision statement should be the foundation of district messaging driving the communications plan and budget priorities. The communications plan should be a flexible tool for organizing, distributing, and tracking the success of the communication. In order to develop effective strategies using technology, WISD should determine the extent to which the district's parent population is wired, that is, what proportion have access to the internet, have computers at home, are on Facebook™ or Twitter™, have and use smart phones, can receive text messages, as well as who has access to cable television. This task could be accomplished by including relevant questions to the existing parent survey and making additional efforts to improve response rates. The medium selected for the message should at least be accessible by the target audience. For example, in 2010, 25 percent of Twitter™ users were African American, making an interesting Twitter™ feed a potential source for reaching that audience.

This recommendation can be accomplished with existing resources.

MAKE IMPROVEMENTS TO THE DISTRICT WEBSITE TO FACILITATE THE DISSEMINATION OF INFORMATION (REC. 13)

WISD's district website is not optimally used. Schools have been on their own for website development, and wide variation exists in the quality and nature of material posted at the school level. As a result, opportunities are missed to effectively disseminate and communicate information. A district's website is a critical source of information for parents and community members. While districts are not limited in the information provided on a website, the state legislature defines in statute which information should be available and prominently located. The review team explored the WISD website to determine the accessibility of information. In some instances, statutory information was difficult to find, and in others, it was not available at all. **Exhibit 3–3** provides a sample of legislative requirements and the availability of the information on the WISD website.

School web pages are a critical source of information for students and parents, and can also contain statutory information such as the dates for college testing and test policies for home schooled children not located on the primary website. Until recently, schools were on their own for development of web pages and content. Only 13 of the schools listed on the district's website (42 percent) have school-level web pages linking from the district website and of those schools that do, quality and content varies substantially. Many schools rely on parents or other volunteers to design websites, resulting in much variability in the extent to which school-specific web pages inform about programs and procedures. Not all teachers have web pages, and many are just biographic.

The website was identified during several interviews as a critical issue for the success of the district's communications department. The district recently hired a webmaster tasked with updating one of the district's primary communication tools. The position has made the site more user friendly and statutorily compliant since this school review was initiated, but there are still opportunities to improve the communication quality of the site.

WISD should improve the district's website to better leverage resources for disseminating information, particularly to parents. The district website should include statutorily required information and updated school web pages. The

EXHIBIT 3–3
TEXAS EDUCATION CODE SAMPLE WEBSITE POSTING REQUIREMENTS
2010–11

CITATION	REQUIREMENT	WISD STATUS
Education Code §11.1513	Posting notice of vacant positions at least 10 days prior to filling position.	Vacancies are posted, and located under Employment tab.
Education Code §21.203	Board employment policies must be posted.	Link to Online Policies located on home page and under Board of Trustees tab.
Education Code §22.003	Posted employee handbook must include information on assault leave.	Information is included. Handbook can be located under Employment tab, Documents and Forms.
Education Code §22.004	If not participating in the state uniform group coverage program, must post insurance contract information.	Medical benefits plan posted under Employment tab, Benefits & Risk Management link, Benefits.
Education Code §28.004(k)(1)	Must post statement of policies for student physical activity.	Reference to board policy in Student Handbook, page 40. Handbook located under Information tab, Parents link, Parent Resources link, Documents link. Actual policy located under School Board tab, Policy Online. Handbook does not have hypertext link to board policy.
Education Code §28.004(k)(2)(A)	Number of times the School Health Advisory Council met the previous year.	Located under Departments tab, Curriculum, Instruction, Assessment link, then Student Services.
Education Code §28.004(k)(2)(B)	Whether district has adopted and enforces policies to ensure campuses comply with vending and food service guidelines for restricting student access to vending machines.	Reference to board policy in Student Handbook, page 40. Handbook located under Information tab, Parents link, Parent Resources link, Documents link. Actual policy located under School Board tab, Policy Online. Handbook does not have hypertext link to board policy.
Education Code §28.004(k)(2)(C)	Whether the district has adopted and enforces policies and procedures prescribing penalties for use of tobacco products on campus or school sponsored events.	Student Handbook, page 40. Handbook located under Parents tab, Parent Resources link, Documents link. Actual policy located under School Board tab, Policy Online. Handbook does not have hypertext link to board policy.
Education Code §28.004(k)(3)	Notice to parents that they can request in writing their child's physical fitness assessment results at the end of the school year.	Embedded in Student Handbook, page 40. Handbook located under Parents tab, Parent Resources.
Education Code §29.916	Notice of dates for the PSAT/NMSQT and college advanced placement tests with a statement that the tests are available for home-schooled students in the district and the procedure for registering.	Unable to locate.
Education Code §38.019(a)(1)(A) and (B)	In English and Spanish, and prominently posted, immunizations required or recommended for public schools.	Provided under Information tab, Parents link, Parent Resources link, Documents.
Education Code §38.019(a)(1)(C)	In English and Spanish, and prominently posted, a list of area health clinics offering influenza vaccination.	Unable to locate.
Education Code §38.019(a)(2) and §38.019(a-1)	In English and Spanish, and prominently posted, a link to the Texas Department of State Health Services for obtaining an exemption from immunization requirements.	Embedded in Student Handbook, page 39. Handbook located under Information tab, Parents link, Parent Resources. Also embedded in the Immunization Requirements document.
Education Code §39.084	Copy of adopted budget with a prominently displayed link. Post must remain until the third anniversary of the date of adoption.	Unable to locate three years of budgets or a detail level budget. Current budget is summary level only.
Education Code §39.362	Not later than 10th day after first day of instruction campus and district "report card" information; and, most recent accreditation status and explanation.	Report Card for 2008—09 posted under Information tab, About WISD, Annual Reports.

EXHIBIT 3–3 (CONTINUED)
TEXAS EDUCATION CODE SAMPLE WEBSITE POSTING REQUIREMENTS
2010–11

CITATION	REQUIREMENT	WISD STATUS
Education Code §44.0041	Budget summary for proposed budget with comparisons to previous year.	Provided under Information tab, Financial Overview link, then Budget Documents link.
Government Code §2265.001	Report of metered amount of electricity, water, or natural gas consumed and aggregate costs for those utility services.	Provided under Information tab, Financial Overview link, then Utility Usage Report link.
Government Code §551.056	Concurrent posting of agenda for the board meeting.	Posted under Board of Trustees tab, link to Meetings.

SOURCE: Texas Legislature Online (www.statutes.legis.state.tx.us) and WISD website (www.wacoisd.org).

district's webmaster should provide web support to schools to ensure that school web pages are linked to the district site, that they contain necessary information, and that they are more consistent in quality. The district should supply schools with templates for web design to ensure that even those schools with fewer technical resources are still able to have high quality, informative, and effective websites for sharing information. Teachers should be encouraged to use the website to further engage students by developing their own pages with class specific content.

Subsequent to the review team's onsite visit, WISD has launched a new website with a robust content management system. Department level Web Publishers have been trained to allow for continuing updates. New campus sites are being designed. Campus based Web Publishers have been trained and will be responsible for keeping campus websites current.

This recommendation can be accomplished with existing resources.

COMBINE RESOURCES FOR EFFICIENCY (REC. 14)

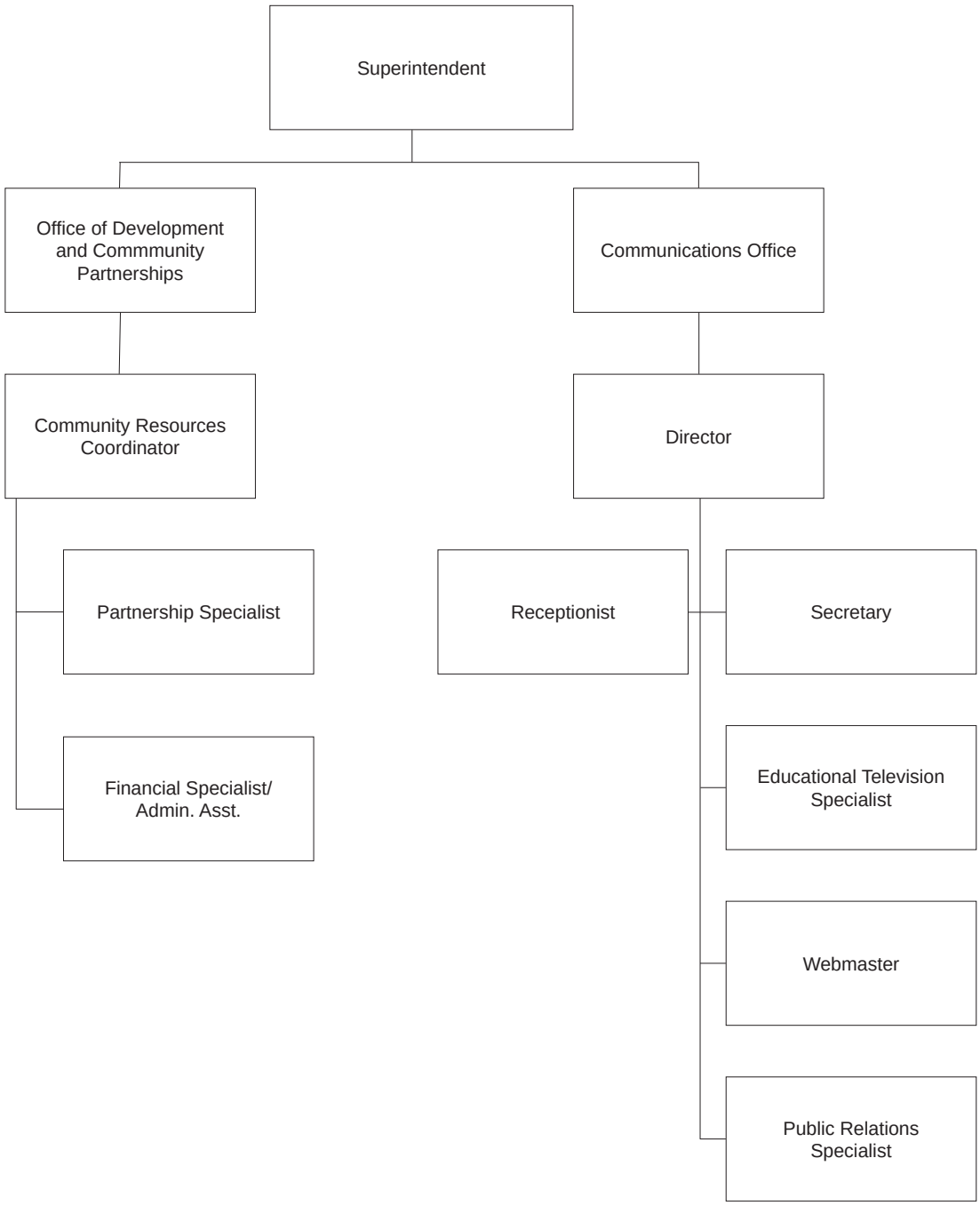
WISD has two separate communications-based departments, the Office of Development and Community Partnerships and the Communications Office, that function independently and do not align communication strategies or share resources. There is no collaborative planning process. As a result, the district misses opportunities for workload efficiencies. **Exhibit 3–4** shows the district reporting structure for its two communication based departments.

The Office of Development and Community Partnerships department is responsible for directing activities that solicit donations of time or money from the community, including the daily operations of the WISD Education Foundation, the Partners in Education Adopt-A-Schools program, assisting the Alumni Association, and supporting the district's Outstanding Teacher program. This office also assists schools in applying for grants. The Community Resources Coordinator provides orientation and training for community partnerships, works with schools to identify needs which could be addressed through community partnership, develops strategic plans for community resource development, coordinates the Education Foundation committee activities and fundraising, develops materials to promote development and recognition of community contributions, and facilitates grant development for the district.

The Communications Office, previously named the Public Information Office, is responsible for responding to public information requests, serving as the liaison between the district and the media, running the district's TV station, managing the district's website, and generally provides for all communication from the district to community and parent stakeholders. The Director develops and implements marketing strategies to promote WISD, advises the management team on public relations issues, prepares the community for district change, facilitates prompt response to requests for information, and evaluates the effectiveness of public information programs. The Public Relations Specialist publishes district newsletters, assists schools with publications, prepares news releases and brochures, surveys readership to determine effectiveness of publications, photographs events for publication, and assists in video interviews. In interviews during the review team's onsite visit, the Director said the Receptionist position was recently added.

Exhibit 3–5 presents the mission statement of each of the district's public communications efforts, and shows how both offices manage communication with stakeholders. It highlights the lack of efficiency in the current organizational structure. For example, while messaging strategies are the responsibility of the Communications Office, the Office of

EXHIBIT 3–4
ORGANIZATION OF THE OFFICE OF DEVELOPMENT AND COMMUNITY PARTNERSHIPS AND THE COMMUNICATIONS OFFICE
2011–12



SOURCE: WISD Organization, October 2011.

EXHIBIT 3–5
PUBLIC COMMUNICATION AND OUTREACH MISSION STATEMENTS
2011–12

OFFICE	MISSION
Communications Office	To provide effective communications for WISD which ultimately result in mutually beneficial relationships between parents, students, staff, taxpayers, media and the district.
Office of Development and Community Partnerships	The Office of Development and Community Partnerships enhances the WISD educational experience by bringing schools and community volunteers and resources together in the Partners in Education Program, by seeking additional financial resources for special programs through grants and donations to the WISD Education Foundation, and by encouraging excellence with the District Outstanding Teacher Recognition and Distinguished Alumni Recognition program.
Partners in Education(Office of Development and Community Partnerships)	To create and support partnerships that ensure educational success and workforce readiness in our community. Partnerships will: Foster values and skills that lead to educational success and productive citizenship. Provide curriculum support and experiences relevant to current and emerging careers. Support continuous professional development for principals, faculty, and staff.
Education Foundation (Office of Development and Community Partnerships)	The WISD Education Foundation is a 501(c)3 corporation organized to raise money, make decisions and fund grants for the improvement of public education in Waco. The WISD Education Foundation funds creative projects that impact student performance and "raise the power of education" in Waco schools. Its mission is “Advancing excellence in education through creative and innovative community funding.”
Alumni Association (Office of Development and Community Partnerships)	Welcome to the Waco Public Schools Alumni Association. We are a support unit based in Waco, Texas, working to enhance Waco Public Schools through alumni programming, advocacy, fundraising and volunteer action.

SOURCE: WISD website, 2011.

Development and Community Partnerships develops marketing materials and strategies for fundraising and volunteer solicitation. In addition to inefficiencies, the risk of competing or confusing strategies is greater when similar responsibilities are assigned to different departments.

The Office of Development and Community Partnerships differs from the Communications Office in its focus on fundraising. In interviews, district staff said approximately 50 percent of time was spent on the Education Foundation.

Other districts have public information offices responsible for internal and external communication. **Exhibit 3–6** compares WISD’s communications and community involvement services to its peers: Tyler Independent School District, Bryan Independent School District, Donna Independent School District, and Harlandale Independent School District.

Tyler ISD’s Communications Office is additionally responsible for media relations, community partnerships, resource development, special events, the district website, and the television studio. Donna ISD has a single point of contact for information requests, but does not staff a full service communications office. While there are many ways to structure an organization, an organization that duplicates rather than complements the assignments risks productivity and effectiveness. School districts around Texas consistently search for a more efficient organization as a way of managing budget, putting more resources in the classroom, and still providing needed administrative support.

WISD should merge the Office of Development and Community Partnerships with the Communications Office and redistribute duties for more effective deployment of resources. The merger should begin with a unified mission and evaluation of each position to determine if current assignments are the most effective use of the resource in carrying out the mission. **Exhibit 3–7** shows a more efficient organizational approach.

By merging the two existing departments, with both reporting to a Communications Director, the Communications Director position would be able to operate in a strategic capacity, guiding and directing activities, ensuring that messages are coordinated across several platforms and mediums, and coordinating activities between community development and communications to achieve efficiencies and build the district’s brand, or product, that identifies it to the community. Under this structure, the receptionist position would become the Intake Officer, managing and directing incoming calls for information and assistance and coordinating the compilation of records

EXHIBIT 3–6
COMPARISON OF PEER COMMUNICATIONS AND COMMUNITY INVOLVEMENT SERVICES
2011

DISTRICT	COMMUNICATIONS DEPARTMENT	SEPARATE COMMUNITY OUTREACH DEPARTMENT	FOUNDATION FUNDRAISING SUPPORT	CATV	WEB PRESENCE
WISD	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
Tyler ISD	Yes	No	No	Yes	Yes
Bryan ISD	Yes	No	Yes	Shared	Yes
Harlandale ISD	Yes	No	Yes	No	Yes
Donna ISD	Yes	No	No	No	Yes

SOURCE: Peer District websites, November 2011.

pursuant to the Public Information Act. The Media Coordinator position, formerly the position of the Public Relations Specialist, would take current print/photography duties to a new level, by applying strategies across all areas of the district's outreach efforts, including the district's website, television station, and materials for fundraising and volunteer programs. In this way, the district can harness branding strategies, working towards establishing a positive image that merges the work of the Development and Community Partnerships and Communications departments.

In Strategic Communications, individual positions of the Community Campaign Coordinator, the Community Partnerships Specialist, and the Fundraising Support position would remain mostly intact, but would work more closely with the webmaster position and the television station to fully leverage those communication tools. Working more closely with the webmaster and the Media Coordinator positions, and supervised by the Communications Director, the Community Campaigns Coordinator position would take on responsibility for the district's social media presence, using that resource not only for building partnerships and community relationships, but for reaching out to parents and other stakeholders. The Community Campaigns Coordinator position would assist in the development of, and be responsible for, execution of campaigns, working with the media coordinator, to develop the most effective media for the message.

As new outreach and messaging is developed, duties not consistent with the new direction should be proportionally reduced or distributed to a more appropriate position in the district. The grant development tasks currently performed in Development and Community Partnerships could be consolidated in the district grant manager chain of command. Development of a community-wide campaign to win a corporate grant contest would be developed as part of the district community development strategies.

Subsequent to the review team's onsite visit, WISD reported that the Communications Office and the Office of Development and Community Partnerships have been merged and renamed WISD Department of Communications. The district reported that a weekly staff meeting is held to ensure collaborative planning, sharing of resources and aligned communications strategies. In the summer of 2012, the newly merged office will write a communications plan that supports the district's strategic vision, outlines objectives and communications strategies that reach target audiences with appropriate messages.

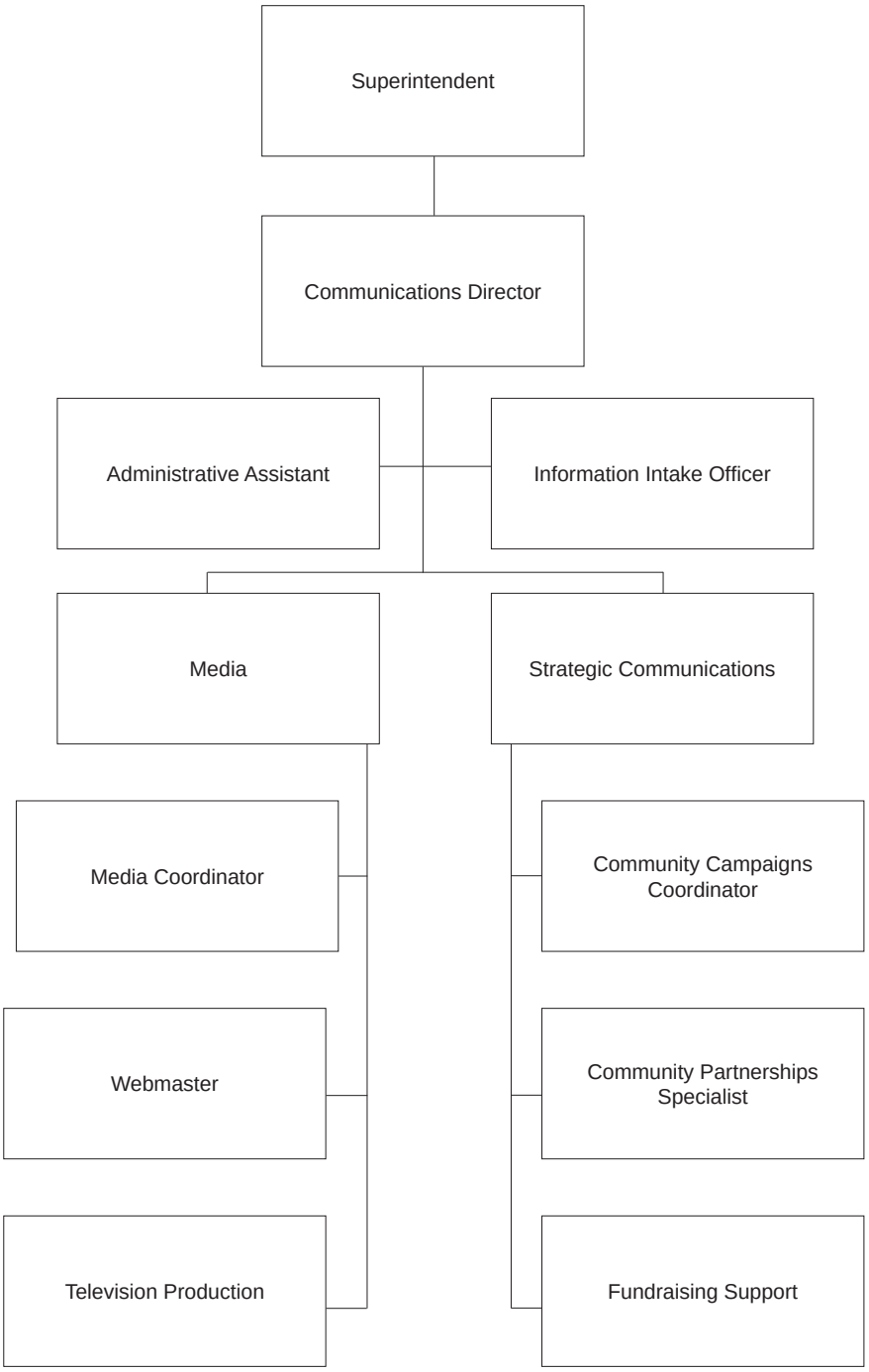
This recommendation can be accomplished with existing resources.

MARKETING VOLUNTEER AND PARENT INVOLVEMENT PROGRAMS (REC. 15)

The district does not have an organized program for attracting and involving parent and community volunteers throughout the district. The Office of Development and Community Partnerships spends much of its resources supporting the Education Foundation. While the office successfully fundraises for support of school programs, the office performs little marketing or solicitation of new volunteers to provide direct support to district schools. Much of the community outreach is left to the individual schools. As a result, district schools do not enjoy comparable levels of community and parent support.

WISD has dedicated three staff to the development of community and business relationships. The Community Resources Coordinator is primarily responsible for activities that establish and maintain financial and volunteer resources, including orientation and training programs for community

EXHIBIT 3–7
EXAMPLE OF MERGER INTO SINGLE COMMUNICATION AND COMMUNITY DEVELOPMENT OFFICE



SOURCE: Review Team Analysis, 2011.

volunteers, assessing district and school needs for community resources, supporting the Education Foundation, developing and coordinating fund-raising activities and special events, and developing materials and publications to promote the development and recognition of community contributions, as well as supporting grant development. The Partnership Specialist is responsible for the district's community/business partnership efforts, including the promotion of partnership programs, ongoing assessment of district needs, organization of volunteers, maintenance of a database of partnerships, recruitment of new partners, and development of newsletters and publications for the promotion and recognition of partnership programs. The Financial Specialist/ Administrative Assistant is responsible for managing the Community Resources office, managing the accounting and financial record keeping, and keeping databases for external financial resources for the department. District schools also have designated volunteer liaisons responsible for maintaining contact with volunteers and providing opportunities for continued engagement in schools.

COMMUNITY INVOLVEMENT

Typically, volunteers will contact the district indicating their desired type and location of involvement. The Office of Development and Community Partnerships then contacts that school to determine whether or not that type of support or involvement is desired by the school. A volunteer who will be on school grounds or at school events must pass a background check and receive some level of training, depending on the assignment. Schools must identify opportunities for volunteers to provide meaningful assistance while maintaining safety and privacy boundaries, organize volunteer activities, and schedule volunteers. The school liaison is expected to submit a plan for volunteer use to the partnership specialist each year.

Many businesses providing support at a particular school have been in place for years. A business may initiate a relationship with a particular school when a business owner or employee has a student in that school. When the student graduates, the Office of Development and Community Partnerships does not contact the partner to see if they would support alternative schools, or attempt to distribute resources across the district when a new partner joins the program. In interviews, staff at one school said they have not had a new Adopt-a-School partner in years. **Exhibit 3–8** shows the number of Adopt-a-School Partners at district schools.

EXHIBIT 3–8
COMPARISON OF ADOPT-A-SCHOOL PARTNERS AT WISD SCHOOLS
2010–11

SCHOOL	NUMBER OF PARTNERS
A.J. Moore Academy Magnet School	5
Alta Vista Montessori Magnet School	6
Bell's Hill Elementary School	5
Brazos Middle School	4
Brook Avenue Elementary School	4
Cedar Ridge Elementary School	10
Cesar Chavez PDS Middle School	4
Crestview Elementary School	8
Dean Highland Elementary School	9
G.W. Carver Academy Magnet School	11
Hillcrest PDS Elementary Magnet School	6
J.H. Hines Elementary School	17
Kendrick Elementary School	3
Lake Air Middle Intermediate School	6
Lake Waco Montessori Magnet School	8
Meadowbrook Elementary School	3
Mountainview Elementary School	6
North Waco Elementary School	9
Parkdale PDS Elementary School	11
Provident Heights Elementary School	6
South Waco Elementary School	8
STARS High School	0
Sul Ross Elementary School	9
Tennyson Middle School	6
University High School	5
University Middle School	2
Viking Hills Elementary School	3
Waco High School	9
West Avenue Elementary School	8
WISD Alternative Campus	2

SOURCE: Partners in Education Partnership List, 2010.

The number of economically disadvantaged students is one factor that might distinguish one school as needing more community support to minimize educational risk factors at that school. In WISD, there does not appear to be a strong relationship between the number of partners per school and the number of economically disadvantaged students. Also, elementary schools have a greater number of partners than both middle and high schools.

WISD's central organization for community partnership development reduces the responsibility for schools to solicit and develop community relationships. Centralized oversight also makes sure single community resources are not too heavily used by competing schools. WISD has the proper structure to meet these goals, but lack of organized support has resulted in a failure to leverage resources to address all areas of need. For example, the Partnership Coordinator asks for the volunteer involvement plans, but the reminder was in the October newsletter, almost two months into the school year. In interviews, staff said the difference in participation was related to school leadership and its willingness to take time to determine how to best use volunteers.

While school leadership is part of the engagement process, having an active central facilitator can resolve roadblocks. For example, one central administrator recognized that a school was behind in filing enrollment information. The administrator contacted a school representative as well as Human Resources to determine if the files could be handled by a volunteer without violating student privacy issues. Rather than wait for an administrator to recognize an opportunity, school volunteer liaisons should be able to call the partnership specialist when the school has a problem that could potentially be solved with volunteer help.

The district has recognized some gaps in matching volunteers with need, and has authorized schools to post a "wish list" of items or services needed. While this practice will make identification of needs easier for an individual or business wanting to help, it is selective and may still result in a disproportionate response to different schools.

PARENTAL INVOLVEMENT

Rather than receiving its outreach and marketing support at the central administration level, parental engagement strategies are also developed primarily by the schools. The district does not have a centralized marketing plan that can be applied at the school level, nor does it track individual school efforts to share successful strategies or replicate successful programs. In interviews, low parent involvement at both school and central administration levels was a key concern and an area identified for needed improvement. While parental involvement is a broader category of participation including attendance at student events, support of education at home, and meeting with teachers, the outreach process requires a communication and engagement strategy similar to those for other community engagement programs.

Parental involvement strategies vary by school. For example, Waco High School has a Parental Involvement Plan that relies heavily on automated dialer for contact with parents. University High School solicits parent and other volunteers by distributing fliers at football games, attending neighborhood association meetings, and using the district television station and social media. Several schools invite parents to eat with their children at school. Tennyson Middle School provides incentives such as earning a day free from the standardized dress for students who bring parents to Back to School Night.

The district has strong partnerships with the Greater Waco Education Alliance and with the Waco chapter of the national Parents for Public Schools organizations, and relies heavily on these organizations. WISD also relies on Parent Teacher Associations (PTA) or Parent Teacher Organizations (PTO) to engage parents, though they are not present at every school. District programs offering support and training to parents such as skill-building and parenting classes have mostly ended due to low turnout. Because the district does not measure its communication strategies, it is difficult to know if low turnout was the result of insufficient marketing or community disinterest.

District communication tools such as the television station and website are not fully used for outreach on behalf of all schools. For example, parental and community involvement efforts have been hampered by a lack of Spanish-translation services for outreach materials. At the time of the review team's onsite visit, volunteer applications were not easily located on the district website, and did not provide for communication of district's needs or volunteer interests. Subsequent to the onsite visit, WISD has placed volunteer applications online.

Bryan ISD demonstrates best practices in their use of online resources to post volunteer applications and describe volunteer programs to those who are interested. Navigating to their Volunteers in Public Schools (VIPS) webpage, the

user quickly can read about VIPS duties and can link to an application form available in both Spanish and English. The application form requests the volunteer to indicate the types of activities they are interested in doing, their availability, and a school or grade level preference. The volunteer is then informed that they will soon be contacted.

Another link on Bryan ISD's Community Involvement page explains their HOSTS program (Help One Student to Succeed), a model recognized by the United States Department of Education as a national model for successful mentoring programs. After a brief description of the program, its design, and an explanation of who can volunteer, contact information is provided, including a phone number and link to an external website for interested individuals. By making information accessible, available, and informative, interested volunteers have a direct mechanism through which they can communicate their willingness and ability to become involved, and a central coordinator can manage those requests to best serve the needs of the district's schools.

WISD should increase assistance to schools on both community volunteer and parental involvement programs by developing processes for servicing school needs that includes implementing marketing campaigns to attract and retain volunteers, tracking volunteer program success factors, and replicating successful programs in other schools.

Implement a marketing strategy. The district should identify methods of increasing the visibility of volunteer opportunities. The district should, at a minimum, have a volunteer page on their website with links to online or printable forms, volunteer opportunities, and testimonials from volunteers and staff. Volunteer training programs could be developed through the Office of Communications for CATV or website viewing. The strategy should identify district priorities and develop program specific solicitations. For example, if the district priority is getting students to read on grade level, WISD should have a volunteer strategy that complements the priority. Schools with high need but low participation should have an individualized plan to increase volunteer participation.

Track services and success factors. The district Technology Services Department should develop a database for volunteer contact information. The database should include the areas of volunteer expertise or areas in which they are willing to help. School liaisons should be trained on use of the database to enter hours worked and the value of funds or items donated. The database should be used to generate thank you notes, identify "super" volunteers for recognition, provide tax donation letters, and other continuing contacts. Forms, form letters, and other routine correspondence should be designed to easily merge volunteer information from the database. If the volunteer effort is a program developed or provided by an organization, the goal of the program and its success measures should be periodically evaluated for possible replication.

Facilitate replication of successful programs. Where a community partner or organization is providing volunteers for a successful program, the district should explore replication of the program in other schools. Active PTO/PTAs should be asked to adopt a school without a robust program and assist in developing a strong parent-teacher program. Individual volunteers interested in a program could be referred to the provider for training and program development.

This recommendation can be accomplished 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	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
12. Develop and implement a communications planning process that aligns messages and measurable strategies to ensure effective allocation of resources.	$0	$0	$0	$0	$0	$0	$0
13. Improve the district's website to better leverage resources for dissemination of information, particularly to parents.	$0	$0	$0	$0	$0	$0	$0
14. Merge the Office of Development and Community Partnerships with the Communications Office and redistribute duties for more effective deployment of resources.	$0	$0	$0	$0	$0	$0	$0
15. Increase assistance to schools on both community volunteer and parental involvement programs by developing processes for servicing school needs that includes implementing marketing campaigns to attract and retain volunteers, tracking volunteer program success factors, and replicating successful programs in other schools.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 3	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 4

HUMAN RESOURCES MANAGEMENT

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 4. HUMAN RESOURCES MANAGEMENT

Human resource management (HR) involves recruitment, hiring, development, compensation (salary and benefits), retention, evaluation, promotion of personnel within the division, and compliance with equal employment opportunity statutes and other federal and state laws. HR management is an important area to examine in an organizational review of this nature, as more than 75 percent of all financial resources in public education are devoted to labor expenses. As financial resources for school districts become increasingly restricted, HR management is an area that is often looked to for change, primarily because the fiscal impact can be significant.

Exhibit 4–1 shows 2009–10 payroll costs (general fund) as a percentage of total expenditures for Waco Independent School District (WISD) and its peers. Peer districts are districts similar to WISD that are used for comparison purposes.

At 78.2 percent, WISD expends a lower percentage of general funds on payroll costs than three of the four peer districts.

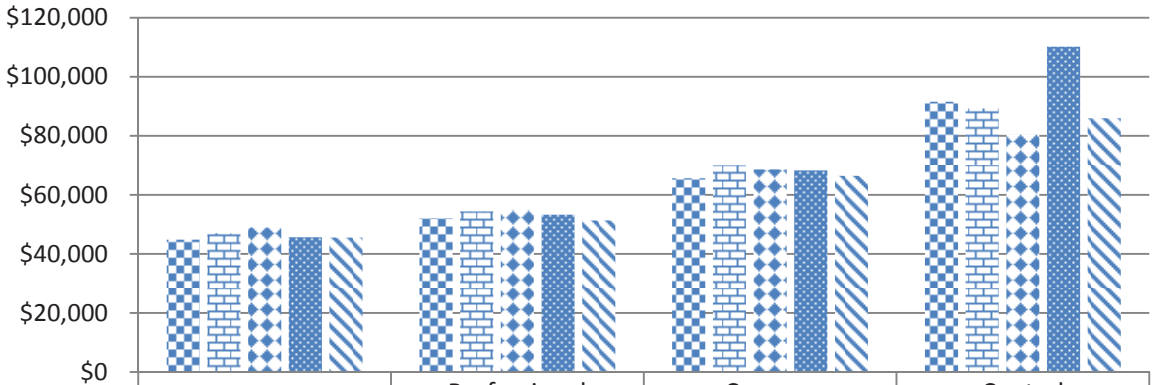
EXHIBIT 4–1
WISD AND PEER DISTRICT PAYROLL COSTS
2009–10

DISTRICT	PAYROLL COST (PERCENT)
Donna	77.6%
Waco	**78.2%**
Harlandale	81.1%
Tyler	81.9%
Bryan	84.7%
Average	**80.7%**

SOURCE: Texas Education Agency; Academic Excellence Indicator System (AEIS) Report, 2010–11.

Exhibit 4–2 shows WISD's average salary by employee category. In all categories, WISD's average salaries are among the lowest compared to its peers.

EXHIBIT 4–2
WISD AND PEER DISTRICTS AVERAGE SALARIES
2010–11



	Teachers	Professional Support	Campus Administration	Central Administration
Bryan	$44,820	$52,096	$65,665	$91,540
Donna	$47,031	$54,432	$70,055	$89,282
Harlandale	$49,005	$55,214	$68,621	$80,506
Tyler	$45,634	$53,307	$68,329	$110,211
Waco	$45,547	$51,366	$66,446	$85,943

SOURCE: Texas Education Agency, AEIS Report 2010–11.

As shown in **Exhibit 4–3**, WISD auxiliary staff represents the second largest percentage of employees (27 percent) behind teachers (50.7 percent) according to the Texas Education Agency's (TEA's) Academic Excellence Indicator System (AEIS).

The HR Department's actual expenditures for school year 2010–11 were $687,572, with 73.14 percent being spent on professional, paraprofessional, extra duty support staff, substitute paraprofessional and substitute teacher salaries. The 2011–12 HR Department budget is $684,572.

ACCOMPLISHMENTS

- The HR Department initiated and completed a comprehensive job analysis project to update all of the paraprofessional job descriptions in the district.
- The HR Department conducted an employee climate survey and, in response, initiated a compensation study performed by the Texas Association of School Boards (TASB).

FINDINGS

- The HR Department does not meet industry standards for staffing guidelines and is not organized around work functions performed by the department.
- Processes in the HR Department are paper-intensive and manual, and are performed using outdated software systems.
- The number of substitutes available in the Substitute Employee Management System (SEMS) is not adequate to meet the needs of the schools.
- The new employee orientation process is paper-intensive and does not prepare new employees to contribute to the organization.
- The district does not adequately track and address employee retention and turnover.

RECOMMENDATIONS

- **Recommendation 16: Increase HR staff and reorganize the department around areas of responsibility.**
- **Recommendation 17: Upgrade systems and streamline HR processes to reduce paper and eliminate duplicate data entry.**
- **Recommendation 18: Increase the number of substitute teachers available by expanding the substitute pool and adding incentives for working on Mondays and/or Fridays.**
- **Recommendation 19: Redesign the new employee orientation program to prepare new employees to become productive members of the organization as quickly as possible.**
- **Recommendation 20: Increase focus on employee retention by capturing more detailed information on exit interviews, and investigating and acting on (if appropriate) the information received.**

EXHIBIT 4–3
WISD STAFF COUNTS AND PERCENTAGES
2010–11

CATEGORY	ACTUAL STAFF	PERCENT	REGION 12	STATE
Teachers	1,077.3	50.7%	49.5%	50.5%
Professional Support	211.7	10.0%	7.5%	9.0%
Campus Administration	70.9	3.3%	3.0%	2.8%
Central Administration	16	0.8%	1.1%	1.0%
Educational Aides	177	8.3%	12.1%	9.5%
Auxiliary Staff	573.7	27.0%	26.7%	27.1%
TOTAL STAFF	**2,126.6**	**100.0%**	**100.0%**	**100.0%**

NOTE: Total percentages may not add to 100 percent due to rounding.
SOURCE: Texas Education Agency/AEIS Report 2010–11.

DETAILED ACCOMPLISHMENTS

UPDATED JOB DESCRIPTIONS

Within the last year, the WISD HR Department initiated and completed a comprehensive job analysis project to update all of the paraprofessional job descriptions in the district. To accomplish this, HR staff provided a job analysis questionnaire that was completed by each paraprofessional employee, then reviewed and signed by each employee's supervisor. The HR Department staff, with support from Texas Association of School Boards (TASB), has been reviewing each job analysis questionnaire and determining if the employee is classified correctly and placed on the correct salary scale.

Additionally, as part of the performance appraisal process, the HR Department provides a copy of each employee's current job description to the appropriate supervisor. Supervisors then review each job description and provide notes to the supervisor of Personnel Services regarding any new job duties and/or duties that are no longer performed by the employee. The supervisor of Personnel Services then reviews all changes made by the employees' supervisors for appropriateness, makes necessary changes to the job descriptions, and provides the updated job descriptions to each employee for review and signature.

Job descriptions serve a very important function in an organization. Not only are they used during the hiring process to identify the appropriate knowledge, skills and abilities of candidates for employment, an accurate job description can be a valuable resource for performance management by establishing an agreement between the employer and employee about what acceptable job performance looks like. Additionally, they can be extremely helpful in identifying necessary training and development to bring an employee up to an acceptable level of performance.

Properly written job descriptions may also assist an organization in identifying light or modified duty options that are available to more quickly transition employees from workers' compensation leave back into the workforce.

During the site visit, the review team examined a random sample of personnel folders and found that each one examined contained a recent, signed copy of the employee's job description.

CLIMATE SURVEY CONDUCTED

In 2011, the HR Department conducted an employee climate survey and, in response, initiated a compensation study performed by TASB. Employee climate surveys are a simple, valuable and cost-effective way to measure and monitor the atmosphere and morale of an organization. They are especially successful in identifying issues – particularly those that are hidden from senior management – before they become serious.

The WISD surveys were available online and on paper and were completed by 1,704 staff (82 percent of elementary school staff, 77 percent of middle school staff, 75 percent of high school staff), with an overall, districtwide response rate of 80 percent.

Teachers represented 50 percent of all respondents, with auxiliary staff, other professional staff, instructional aides, and clerical/office staff representing 15, nine, seven, and seven percent, respectively. District and campus administrators represented five percent of total respondents.

The survey asked employees to indicate varying degrees of agreement or disagreement with a battery of statements related to:

- job satisfaction (e.g., "I would recommend my campus or department to a friend as a good place to work");
- co-worker support (e.g., "My coworkers help me be successful");
- working conditions (e.g., "The hours I work are reasonable");
- supervisor support (e.g., "I am allowed to make appropriate decisions within my scope of authority");
- campus environment (e.g., "I am satisfied with employee communications at the campus level");
- teacher support (e.g., "I am satisfied with services from paraprofessional support staff");
- curriculum and instruction services and support (e.g., The instructional program in my school enables students to master the required TEKS"); and
- student discipline support (e.g., "Our student code of conduct is consistently and fairly enforced").

Overall, support from supervisors was determined to be the most important contributor to job satisfaction (with 66 percent of respondents indicating this), with meaningful work garnering nearly the same percentage of responses at 65 percent. Next were compensation and benefits (57 percent), support from coworkers (56 percent), working conditions (55 percent), and job security (50 percent).

Responses to questions indicating supervisor support and meaningful work were mostly positive; however, that was not the case for the compensation and benefits related questions. Only 65 percent of respondents indicated that they agreed with the statement "I am paid fairly for the work I do", and 67 percent of respondents agreed that "my pay is competitive with other districts in this area."

Because of these low-scoring responses related to compensation, the department commissioned a compensation study, which was also performed by TASB. As a result of the compensation study results, TASB recommended some salary scale adjustments, which were executed by the HR Department.

DETAILED FINDINGS

HUMAN RESOURCES DEPARTMENT STRUCTURE (REC. 16)

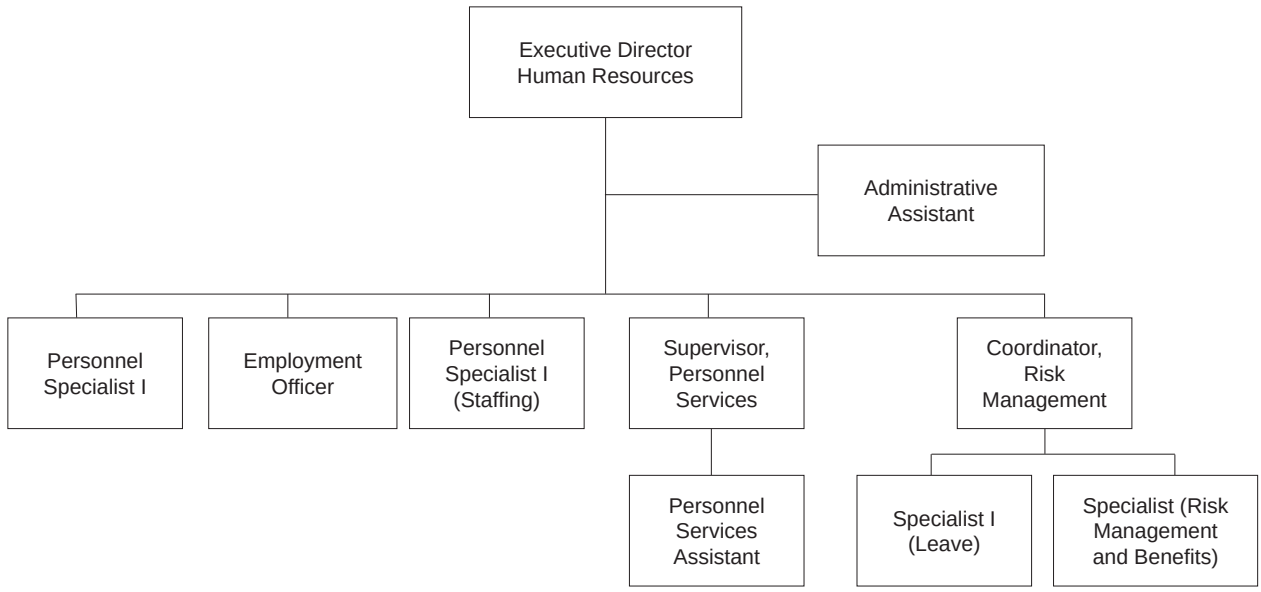
The HR Department does not meet industry standards for staffing guidelines and is not organized around work functions performed by the department. Similar duties within the HR Department are performed by several staff and are not aligned under the same supervisor. Some staff members have a disproportionate number of responsibilities.

A current organization chart was not provided for the HR Department. **Exhibit 4–4** shows an organization chart that was constructed by the review team based on the old organization chart, job descriptions and staffing information provided byHR employees. The following is an illustration of the current 10-person HR organization. Six of the nine employees in the WISD HR Department report to the executive director.

School districts vary in how the HR Department is organized, as well as which functions fall under the department's purview. WISD's HR Department includes both risk management and benefits, which sometimes reside in departments other than HR.

In the WISD HR Department, there are numerous instances of similar duties being performed by different staff. For example, two employees, the supervisor of Personnel Services and the coordinator of Risk Management, perform recruiting

EXHIBIT 4–4
CURRENT WISD HR DEPARTMENT ORGANIZATION



SOURCE: Review Team; WISD job descriptions and staffing file as of October 2011.

duties. The coordinator oversees auxiliary employee recruiting, and the supervisor performs recruiting for all other employee types.

Three employees are responsible for processing applications for employment. The leave specialist, who reports to the coordinator of Risk Management, processes substitute applications. The employment officer processes administrative and professional applications, and shares auxiliary application processing with the staffing specialist, who also processes paraprofessional applications. Both of these employees report directly to the executive director.

Two employees share duties related to employment eligibility verifications. A personnel specialist is responsible for completing and tracking I-9 forms to comply with requirements from the U.S. Citizenship and Immigration Services. However, the administrative assistant for the executive director manages H-1B visas for foreign, non-immigrant workers in specialty occupations.

The supervisor of Personnel Services supervises one personnel services assistant and oversees recruitment for all employee types except for auxiliary. These two employees are also responsible for certification/highly qualified administration and reporting, compensation, teacher contracts, service records, stipends, Teacher Retirement Systems (TRS) and TRS Reporting and Query System (TRAQs), Public Education Information Management System (PEIMS) for personnel data, the employee handbook, new employee orientations, data entry of employee changes into the payroll system, and electronic records and personnel file management.

The coordinator of Risk Management supervises two personnel specialists and oversees auxiliary recruiting, substitute applications and processing, employee benefits and leave. Recently, the department eliminated an HR specialist position, which reported to the coordinator, and was responsible for auxiliary recruiting and application processing.

Some functions within HR are outsourced, such as: the administration of COBRA (Consolidated Omnibus Budget Reconciliation Act) is performed by the benefits administration company Conexis; workers' compensation administration, compensation studies and adjustment recommendations, as well as employee climate surveys, are performed by the Texas Association of School Boards (TASB); and the health insurance plans are administered by First Financial.

As currently staffed, the HR Department does not have enough employees to properly address several major strategic matters including process improvement, absenteeism, and employee retention. Also, according to staff, the department does not have the necessary staff to review and purge employee files of documents according to the TASB records retention/file destruction guidelines.

Other tasks that may require additional staff are:

- The fingerprinting of district staff who have direct access to children (such as nurses), but who were employed prior to 1/1/2008;
- Fully documenting department procedures and guidelines, such as criminal history guidelines; and
- Scanning active personnel files to electronic format.

According to the 2009 Society for Human Resource Management (SHRM) Human Capital Benchmarking Study, an organization, such as WISD, with approximately 2,100 employees typically has a minimum of 12.6 full-time-equivalents (FTEs) in their HR Department. The WISD HR Department has 2.6 fewer FTEs than is recommended.

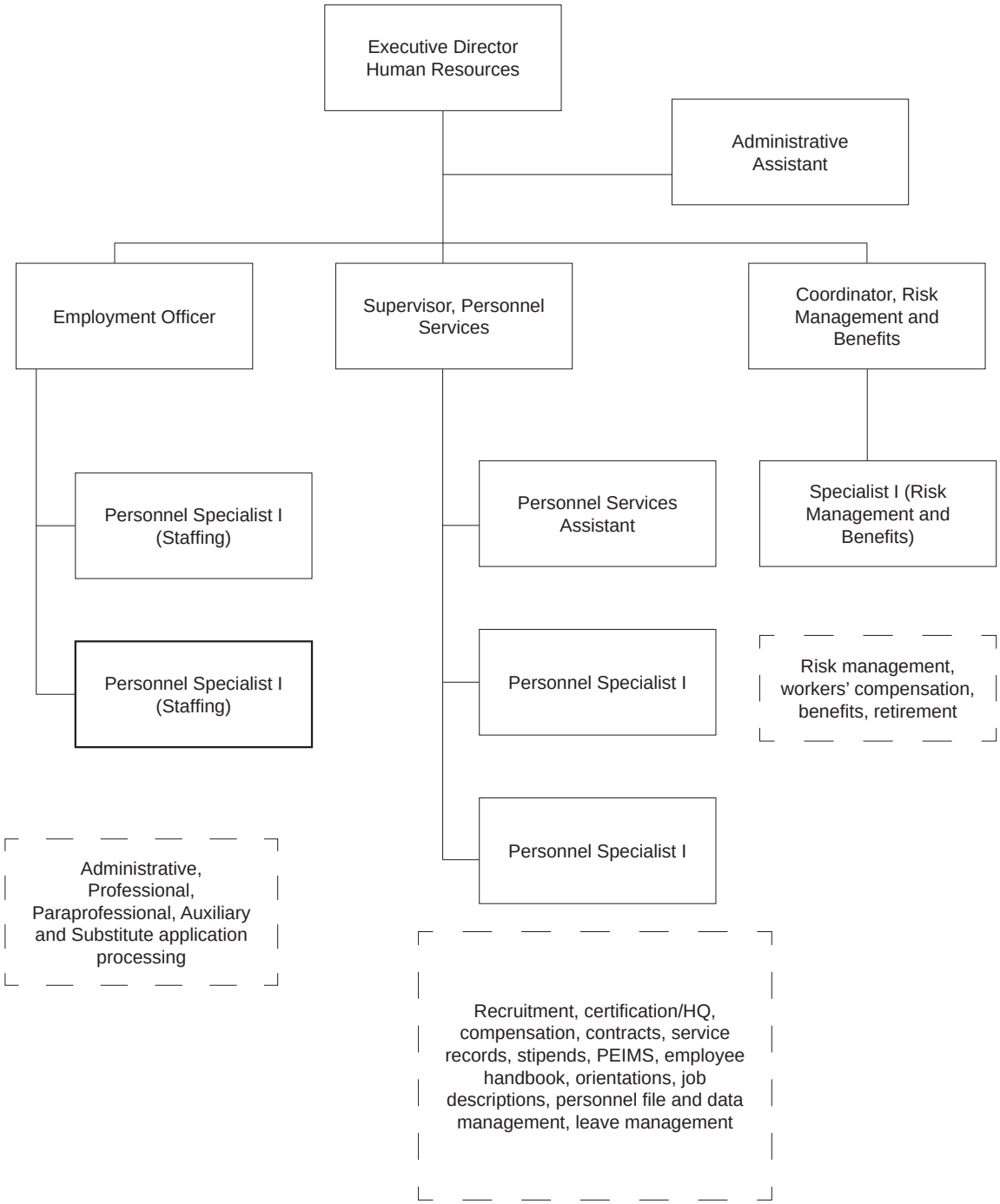
The district should increase HR staff and reorganize the department around areas of responsibility.

Although the SHRM study indicates that two and one-half staff members are needed, the review team recommends that one additional staff member should be added to the HR Department due to district financial constraints. Once systems are upgraded and processes are streamlined, these new staffing levels will be sufficient to perform daily operations.

Additionally, the organizational alignment and job duties of existing positions in the Human Resources Department should be adjusted. Application processing should be aligned under the employment officer, with all applications (administrative, professional, paraprofessional, auxiliary and substitutes) being processed by the officer and two personnel specialists for staffing.

Two of the existing personnel specialists should report to the supervisor of Personnel Services who will assume responsibility for leave processing and I-9 management. The relocation of these two staff members would allow the supervisor to complete duties related to her responsibilities, as well as accomplish special projects assigned. **Exhibit 4–5** shows the recommended HR Department organization structure. The new personnel staffing specialist is indicated

EXHIBIT 4–5
RECOMMENDED WISD HR DEPARTMENT ORGANIZATION AND DUTIES



SOURCE: Review Team, 2011.

with a bold outline. In brackets underneath each unit are the recommended areas of responsibility for each.

Since the time of the review, WISD has stated that the HR Department's organizational chart has been revised to closer resemble the review team's recommendation.

The fiscal impact includes creating an additional personnel staffing specialist position within the WISD HR organization. The estimated salary for the additional personnel specialist is $31,000 plus approximately $6,820 in benefits (based on a benefits rate of 22%), for a total of $37,820 annually. This figure is based on the average salaries of the current personnel specialist positions. It is recommended that this take effect starting in school year 2012–13.

HUMAN RESOURCES INFORMATION SYSTEMS (REC. 17)

Processes in the HR Department are paper-intensive and manual, and are performed using outdated software systems.

APPLICANT PROCESSING

Until recently, applications for employment were accepted online via a Filemaker Pro database used by the HR Department. During focus groups, participants reported that they have had difficulty using the software. Since the review team's onsite visit, a new online applicant tracking system was implemented (General ASP's AppliTrack).

Once an applicant fills out the online application, the HR Department prints it from the system for processing, which generally includes checking the applicant's criminal history, collecting application documents such as references, transcripts and certifications, and creating the applicant folders.

Once an applicant is selected for hire, an action sheet is generated using the FileMaker Pro database and then printed. This printed form is routed to multiple staff for approval. Once all the required signatures and initials have been obtained, HR scans the action sheet and emails it to payroll staff. The original is filed in the personnel file. Payroll staff files the action sheets in electronic format.

The AppliTrack system is not integrated with eFinancePLUS used by the payroll staff or the FileMaker Pro database, so once an employee is hired, the information is hand-entered into both systems.

EMPLOYEE PROCESSING

SunGard's eFinancePLUS has been used for finance and payroll since approximately 1996. The version of this product that the district uses is no longer sold by SunGard and has been replaced by a web-based product, to which the district plans to upgrade to in the fall of 2012. Although the district owns the Human Resources, Applicant Tracking, and Position Control modules of eFinancePLUS, the HR Department has not implemented them.

An employee's salary must be entered twice in the eFinancePLUS system, once on the HR side and once on the payroll side, in order to pay the employee. Additionally, the HR staff indicates that a major limitation of the payroll module of eFinancePLUS is that a new employee for the next school year cannot be entered into eFinancePLUS until the system has finished paying the outgoing employee who currently holds the job the new employee will be filling. This effort can be difficult, particularly in the summer, when there are a large number of changes to process. Furthermore, using the currently installed modules of eFinancePLUS, it is not possible to determine what positions remain vacant for the upcoming school year.

The HR staff has attempted to fill these gaps using a FileMaker Pro database. However, the employee who developed the database is no longer with the district. Any modifications to this database to comply with law or policy changes must be made by a FileMaker services consulting firm. The review team requested data on the annual costs to maintain the current database, and was provided anecdotal information indicating that the cost for the last year was $106. No supporting documentation was provided.

HR staff report that although the underlying technology for this FileMaker Pro database is outdated, it meets their needs by keeping accurate staff rosters and automating certain tasks (e.g., creating action sheets when employment changes are processed). However, duplicate entry of employee information is required due to the lack of integration with other systems. A new employee must be entered into eFinancePLUS and FileMaker Pro. If the employee is a paraprofessional, administrator, or teacher, he or she must also be entered into the district's substitute management system (SEMS by eSchool Solutions). The vendor is no longer updating the SEMS program, and it has been replaced by a new, web-based tool called SmartFindExpress.

BENEFITS OPEN ENROLLMENT PROCESSING

Currently, each new employee enrolls for benefits during an appointment time that is scheduled by the benefits specialist during new hire orientation. During these appointments, each new employee works with "enrollers" (i.e., staff members from the third party administrators), who assist them in making benefits selections and filling out the necessary paperwork.

Once the employee has completed the paperwork, the benefits specialist verifies that the forms have been completed correctly, performs any manual proration calculations for

employees working less than a full first pay period, and sets up the benefits deductions in the eFinancePLUS software.

The benefits specialist indicated that the district will be implementing an online benefits enrollment process in the near future, but was uncertain if the data collected during this online process would be automatically transferred into the eFinancePLUS payroll system.

BENEFIT DEDUCTION PROCESSING FOR THOSE EMPLOYEES WHO ARE ON LEAVE

When an employee is out on Family Medical Leave or workers' compensation and must pay for benefits deductions outside of the payroll process, the benefits specialist performs a highly manual process in order to accomplish this task.

As employees deliver or mail in payments, the benefits specialist notes the receipt of the check in Excel. Next, a paper form is completed for each employee and deduction. For example, if an employee has health insurance, dental insurance, and life insurance, the benefits specialist fills out three separate paper forms. Then, the benefits specialist personally delivers the forms and checks to the Accounting Department, where a paper receipt is written for each one and provided to the benefits specialist.

For those benefits which only have an employer portion, the benefits specialist generates a manual request for each deduction for each employee using the FileMaker Pro database. Each request form is printed and personally delivered to the accounting office, which prepares a receipt for each one.

The benefits specialist and the accounting office have begun using a shared Excel spreadsheet to convey this information, but this function might be better handled within eFinancePLUS once it is upgraded.

SUBSTITUTE TRACKING AND PLACEMENT

Applications for substitutes are accepted using AppliTrack. Once a substitute is hired, the personnel specialist for leave manually enters the new substitute's data into the eSchool Solutions substitute employee management system (SEMS). The vendor is now encouraging clients to transition from SEMS to SmartFindExpress, the vendor's current substitute management product.

When employees who require substitutes anticipate an absence, they call the absence into SEMS, which is then converted into a substitute job. The system begins trying to locate and secure the appropriate type of substitute (e.g., math teacher, instructional assistant). Substitutes may accept a job by telephone or the internet. Typically, no manual intervention from HR or school staff is necessary to get a substitute placed.

The personnel specialist also maintains a spreadsheet of approved substitutes (separate from SEMS) which she provides to school leaders and secretaries periodically. Not only does this necessitate duplicate entry of substitute information, but principals and secretaries sometimes bypass the use of SEMS and directly call substitutes from this list. Occasionally, school staff forgets to enter the absence and assigns the substitute to a job, possibly causing the substitute to not be paid for those hours. Additionally, there are some issues with version control in that principals and secretaries sometimes use old lists to call substitutes.

REPORTING

The district uses Cognos, an IBM reporting product, to extract information from eFinancePLUS. HR staff must access this application by remotely connecting to a computer where it is installed. HR staff explained that the specific release of Cognos owned by the district cannot run on the version of Windows used in HR. Additionally, the reporting that can be generated by HR staff is limited by their knowledge of the software.

As a result of the use of outdated systems that are not integrated, the same data is entered multiple times. Additionally, there are processes that begin in an electronic manner, but are ultimately processed on paper. These activities do not add value and further burden an HR Department that has recently downsized.

The district should work to upgrade systems and streamline HR processes to reduce paper and eliminate duplicate data entry. The ultimate goals of implementing this recommendation are:

- Upgrading systems to the latest releases (eFinancePLUS and SEMS);
- Eliminating duplicate entry of identical data into systems and spreadsheets (by establishing data transfers and discontinuing duplicate entry); and
- Migrating data from FileMaker Pro and begin utilizing the functionality in eFinancePLUS.

Because the eFinancePLUS system is central to the processing of employee and financial data, this system should be upgraded to a current version as soon as possible. Further,

HR staff should analyze the tables, fields, and functionalities within the Human Resources and Position Control modules to determine how the FileMaker Pro data can be migrated and the division can take advantage of modern functionality, such as electronic workflow approvals and processing. Once this data is converted, use of the FileMaker Pro database should be discontinued.

Because this database was central to HR reporting at WISD, department leadership should ensure that specifications for key Cognos reports are created and reports are provided to HR staff. Additionally, some Cognos training should be provided to those employees who require data from eFinancePLUS in order to perform their jobs.

Next, the SEMS system should be upgraded to SmartFindExpress (SFE) to provide district staff and substitutes with additional access and functionality. For example, SFE provides multiple levels of approvals for absence requests, flexible parameters which can be entered by substitutes or district staff, and it can be accessed through the telephone, web or iPhone application. Since the review team's onsite visit, this upgrade was scheduled for January 2012.

As part of the software upgrade, WISD should request that the vendor provide some integration services so that data will not need to be entered multiple times. For example, rather than re-entering employees and substitutes in SFE after they have been entered into eFinancePLUS, that data can be automatically transferred from eFinancePLUS to SFE.

Once this upgrade has occurred, the personnel specialist should discontinue maintaining and distributing the Excel sheet of approved substitutes to schools, as this practice may encourage the circumvention of the process.

When the benefits online enrollment software is implemented, IT staff should ensure that automatic data transfers are in place to move the new benefit information into the eFinancePLUS system for processing through payroll.

The district provided the review team with annual maintenance costs for FileMaker Pro of $106. The substitute management system upgrade from SEMS to SFE has already been budgeted at $19,000 and is not included in the fiscal impact for this chapter. Therefore, the fiscal impact is an annual savings of $106. The fiscal impact for the eFinancePLUS upgrade is detailed in the Financial Management chapter.

SUBSTITUTES (REC. 18)

The number of substitutes available in the Substitute Employee Management System (SEMS) is not adequate to meet the needs of the schools. The review team was informed that recruiting activities for school year 2011–12 were conducted for auxiliary staff (primarily substitutes and temporary employees) only. These recruiting activities consisted exclusively of advertisements in various paper and online locations, such as local newspapers, the WISD television station, and the WISD website.

Once an applicant submits an online substitute application, the personnel specialist for leave creates an applicant file and begins collecting required documentation from the applicant. After documentation has been received and examined, and the applicant is qualified, the personnel specialist must verify that the applicant has a clear criminal history. To do so, an Excel spreadsheet containing all prospective substitutes is uploaded to the State Board for Educator Certification (SBEC) website. Next, the Texas Education Agency (TEA) provides a list of those individuals who are subject to Senate Bill 9 fingerprinting rules, along with a FAST Fingerprint Pass form for each person.

The personnel specialist creates and sends a letter to each individual, requesting applicants to pick up the form and be fingerprinted. Once the applicant is fingerprinted and the criminal history report is made available in the Department of Public Safety (DPS) Clearinghouse, the personnel specialist can review the information for each applicant.

The coordinator for Risk Management and benefits reviews any applicant criminal histories to determine if the offense renders the applicant ineligible for hire.

The personnel specialist creates and sends a letter inviting those applicants with clear criminal histories (who were approved by the coordinator) to the next substitute orientation. Orientations are held once per month, with up to 40 new substitutes attending each one; however, the October 2011 orientation was canceled due to the relocation of the Human Resources Department's offices during that timeframe.

Focus group participants indicated that, frequently, teacher absences are not filled by substitute teachers. Staff participating in focus groups expressed frustration about the difficulty of placing a substitute teacher in every classroom that is vacant due to a teacher absence—both short-term and long-term. One principal indicated that on the day of the focus group, there were two classrooms in their school that

did not have a teacher or a substitute. In these cases, principals and assistant principals frequently cover the classes, or the students in the classes without teachers are split and assigned to multiple teachers who are present on that day. The majority of WISD's absences occur on Monday and Friday, as shown in **Exhibit 4–6**.

Typically, school districts maintain a pool of substitute teachers that is close to 40 percent of the total number of teachers. For example, Austin ISD employs 5,718 teachers and a total of 2,600 substitutes, including non-teacher substitutes (45.47 percent), and Deer Park ISD employs 849 teachers and 350 teacher substitutes (41.22 percent). This allows the districts' classrooms to be staffed, even if some substitutes in the pool work a limited schedule.

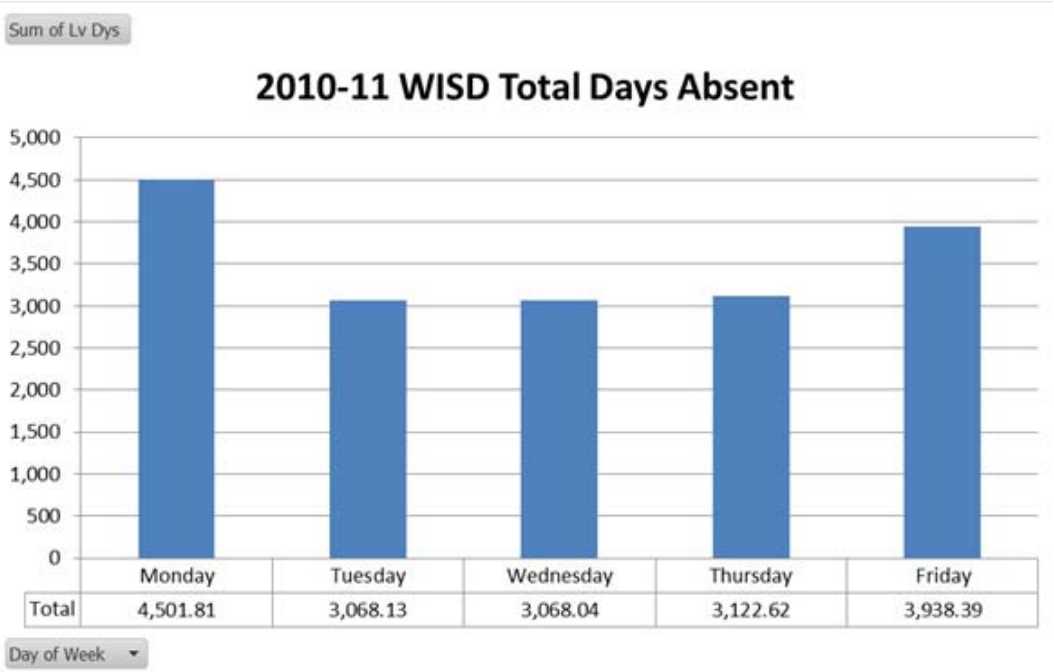
According to the staffing file provided to the review team, WISD has 1,100 teachers and 272 substitute teachers. This indicates a staffing level of 24.7 percent which is almost one-half of the peer staffing levels. Given the issues related by staff and the staffing levels discussed earlier, the substitute pool is not large enough.

Additionally, although there are hundreds of substitute teachers in SEMS, each is not available to work at any school on Monday through Friday. In WISD, substitutes are able to be selective regarding their preferred work days and locations.

WISD should increase the number of substitute teachers available by expanding the substitute pool and adding incentives for working on Mondays and/or Fridays. Some examples of ways WISD might achieve these goals are:

- Conducting weekly substitute orientations from August through October each school year in order to increase the number of substitutes that are available for teachers and administrators. Currently, the district holds monthly orientations for substitutes. These orientations are conducted in order to ensure that an adequate number of substitutes are available for the schools to fill teacher vacancies and absences. HR staff should also conduct monthly informal surveys of principals and assistant principals to determine if this frequency is providing an adequate number of substitutes. If not, the frequency should be adjusted as necessary to meet the needs of the schools.

EXHIBIT 4–6
WISD EMPLOYEE ABSENCES, 2010–11



SOURCE: WISD HR Department, November 2011.

- Providing financial incentives to substitutes for working on hard-to-staff days such as Monday or Friday. For example, Austin Independent School District pays an additional $5.00 per day and Midland Independent School District pays an additional $10.00 per day for those substitutes who work on Fridays.

Increasing the frequency of orientations can be accomplished using existing resources. The precise fiscal impact related to paying a Monday/Friday daily substitute bonus cannot be calculated because it will depend on the number of Monday and Friday teacher absences that require substitutes. However, based on the 2010 data which indicates 3,492 absences (1,522 Monday teacher absences + 1,970 Friday teacher absences), the district would spend approximately $17,460 annually (3,492 absences x an additional $5/substitute).

EMPLOYEE ORIENTATION PROGRAM (REC. 19)

The new employee orientation process is paper-intensive and does not prepare new employees to contribute to the organization.

Upon hire, employees attend an orientation session which was described in focus groups as paper-intensive. During the session, HR staff explains employment paperwork, the new employees fill it out, and then they view compliance-related videos related to blood-borne pathogens and sexual harassment. The training and orientation related to the new employee's department and job is informal and left to the discretion of the employee's manager. This process can be overwhelming and boring for the new employee, and it does little to ensure the success of the new employee in the organization.

Multiple staff interviewed indicated that the orientation provided upon hire in WISD did not prepare them to perform their basic job duties. Specifically, staff indicated that there was very little training provided on district information systems.

An orientation program should provide the organization the opportunity to make a good first impression on the employee and to provide the employee with the tools necessary to become productive as rapidly as possible. An effective orientation program has very little to do with HR or forms. Rather, it focuses on helping the new employee to learn the organization, what it is like to work there, how everything is organized, and how he or she will fit in.

WISD should redesign the new employee orientation program to prepare new employees to become productive members of the organization as quickly as possible. Some key components in this redesign could include:

- Providing pre-orientation packets, including a welcome letter, benefits information, a department organization chart and phone/email directory, and other basic information about the district;
- Providing an introduction to where the employee can find information, once he or she is on the job;
- Delivering a general overview of the organization and key players;
- Scheduling one-on-one meetings with the new employee and employees with whom the new employee will interact (for the purpose of understanding their new role)—this can be accomplished over the employee's first week of work;
- Formally assigning a mentor, or go-to person, who will provide necessary day-to-day guidance, such as how to log into the computer, locations of bathrooms and break rooms, and job-specific questions (or information about who can answer questions); and
- Creating a formal follow-up system during which the mentor meets with the new employee at pre-set intervals, the employee's supervisor provides performance feedback, and the employee has the opportunity to introduce any issues or concerns.

This recommendation can be implemented with existing resources.

EMPLOYEE RETENTION (REC. 20)

The district does not adequately track and address employee retention and turnover. Employee turnover causes lost productivity, as managers redistribute the former employee's workload and find a replacement. Also, when employees leave, their institutional knowledge, skills, and abilities leave with them. Additional costs of employee turnover include the overtime costs for other employees covering the vacancy, the cost of low morale of the employees, the cost of HR and management's time in the selection process for the employee's replacement, and the cost of time spent training a new employee.

TURNOVER

During school year 2010–11, WISD had approximately 447 separations, excluding temporary and substitute employees. Based on a total of 2,157 district employees, according to the 2009–10 AEIS report, the approximate employee turnover rate for WISD is 21 percent. Including 48 regular retirements, 330 separations (or 73.8 percent of the total) were voluntary (i.e., the employee elected to leave WISD).

Exhibit 4–7 shows the reasons given for employees leaving the district. The most common reason given for separating from employment was "personal reasons", with 87 employees (almost 20 percent) providing this reason. This response does not provide actionable information regarding why these employees have decided to resign from WISD.

The next most frequent reasons given were "accepted another position" with 71 responding in this manner, and "regular retirement" with 48 responses.

The data provided regarding employee turnover did not include years of service for the separated employees, so it could not be examined.

EXIT INTERVIEWS

At the time of the review team's onsite visit, exit interviews were performed using paper forms, which were mailed to the former employee's address on file with an envelope containing proper postage for returning the completed form. However, the returned exit interview forms are not regularly consolidated, examined, summarized, and analyzed for trends and issues.

The HR Department leadership indicated that an online exit interview process would be launching shortly after the review team's onsite visit, and future exit interviews will be provided through an emailed link to the questions that can be answered from any internet connected location. This survey application will provide a means to summarize and analyze the returned information. However, in order to continue to reach all former employees who do not have access to the internet, some paper document will most likely still be sent and entered into the online form by HR staff members.

WISD should increase focus on employee retention by capturing more detailed information on exit interviews, and

EXHIBIT 4–7
WISD REASONS FOR SEPARATION
2010–11

REASONS FOR SEPARATION	VOLUNTARY	INVOLUNTARY	TOTAL
Personal Reason	87		87
Accepted Another Position	71		71
Regular Retirement	48		48
Moving	39		39
Temporary Assignment Ended		30	30
Resigned - No Contract		22	22
Resigned - Lieu Termination		18	18
Job Abandonment	18		18
Position Eliminated		18	18
Terminated for Misconduct		17	17
Continue Education	13		13
Other Reason	11		11
Health Reasons	11		11
Unhappy With Job	8		8
Returning To Retirement	7		7
Procedural Termination		7	7
No Letter of Reassurance Returned	4		4
Raise Family	4		4

EXHIBIT 4–7 (CONTINUED)
WISD REASONS FOR SEPARATION
2010–11

REASONS FOR SEPARATION	VOLUNTARY	INVOLUNTARY	TOTAL
Illness In Family	3		3
Resigned-Misconduct		2	2
Terminated – Leave Exhausted		2	2
Walked Off The Job	2		2
Desire for More Compensation	1		1
Leaving Teaching Profession	1		1
Family Hardship	1		1
Deceased		1	1
Resigned - Did Not Return Contract	1		1
TOTAL	**330**	**117**	**447**

SOURCE: WISD HR department, school year 2010–11.

investigating and acting on (if appropriate) the information received.

To ensure that the exit interview captures actionable information on voluntary separation reasons, additional response options should be provided in order to decrease the number of "personal reason" options selected. For example, the "unhappy with job" option could be expanded into several new options such as:

- Lack of Opportunity for Advancement;
- Dissatisfaction with Supervisor or Co-workers;
- Dissatisfaction with Travel;
- Dissatisfaction with Work Hours; and
- Dislike/Unsuitability for Assigned Duties.

The option of "personal reason" should be eliminated or changed to read "personal reason unrelated to job." Selecting the option of "other reason" on the exit interview document should require that the former employee provide some additional information.

In addition to more specific reasons for separation, the district should ensure that other important information is tracked, such as years of service and manager name. Armed with more specific information on why employees are voluntarily leaving the district, the HR Department can deal with issues in a targeted manner.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
16. Increase HR staff and reorganize the department around areas of responsibility.	($37,820)	($37,820)	($37,820)	($37,820)	($37,820)	($189,100)	$0
17. Upgrade systems and streamline HR processes to reduce paper and eliminate duplicate data entry.	$106	$106	$106	$106	$106	$530	$0
18. Increase the number of substitute teachers available by expanding the substitute pool and adding incentives for working on Mondays and/or Fridays.	($17,460)	($17,460)	($17,460)	($17,460)	($17,460)	($87,300)	$0
19. Redesign the new employee orientation program to prepare new employees to become productive members of the organization as quickly as possible.	$0	$0	$0	$0	$0	$0	$0
20. Increase focus on employee retention by capturing more detailed information on exit interviews, and investigating and acting on (if appropriate) the information received.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 4	**($55,174)**	**($55,174)**	**($55,174)**	**($55,174)**	**($55,174)**	**($275,870)**	**$0**

CHAPTER 5

FACILITIES USE AND MANAGEMENT

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 5. FACILITIES USE AND MANAGEMENT

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

Waco Independent School District (WISD) is a non-metro district located in Waco, Texas that serves over 15,300 students in and around McLennan County. It has 32 schools: 17 elementary, 2 Montessori magnet schools, 1 intermediate school, 5 middle schools, 3 high schools, and 4 alternative schools. Two alternative schools are housed at one instructional campus. There are additional administrative and support facilities.

Local enrollment has been steady at just over 15,000 over the past few years. **Exhibit 5–1** provides a summary of student enrollment from school year 2006–07 to 2010–11.

EXHIBIT 5–1
WISD ENROLLMENT BY YEAR
2006–07 TO 2010–11

SCHOOL YEAR	ENROLLMENT
2006–07	15,403
2007–08	15,171
2008–09	15,371
2009–10	15,524
2010–11	15,302

SOURCE: Texas Education Agency, Student Enrollment Reports, 2006–07 to 2010–11.

The Facilities and Maintenance Department is responsible for a diverse set of facilities covering almost 3.1 million gross square feet (GSF), summarized in **Exhibit 5–2**.

The district indicated that the WISD building inventory will increase beginning in school year 2012–13 with the addition of Bell's Hill Elementary, completed in 2012, bringing the total GSF of WISD facilities to over 3.1 million SF.

The department is led by the director of Facilities and Maintenance, who reports directly to the assistant superintendent for Business and Support Services. The director immediately supervises four staff positions; coordinator of Environmental Management, coordinator of Maintenance, Maintenance Business specialist, and the departmental secretary. The coordinator of Maintenance supervises three supervisors: Building Maintenance (Physical Plant), Grounds, and Custodial.

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

- Maintenance—26 full-time equivalents (FTEs);
- Athletic crew—5 FTEs;
- Custodial—155 FTEs;
- Grounds—14 FTEs; and
- Secretaries—2 FTEs.

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

WISD's total facility maintenance and operating per student expenditure of $990 is higher than the average of $927 reported by a group of peer districts (including Bryan, Donna, Harlandale, and Tyler ISDs). Peer districts are districts similar to Waco ISD that are used for comparison purposes. A summary of the WISD Maintenance and Operations (M&O) budget for 2011–12 is presented in **Exhibit 5–4.**

Based on the 2011–12 Adopted District Budget for WISD, the Plant Maintenance and Operations budget is $10.6 million, with 32.5 percent of the total budget for maintenance, 6.2 percent for custodial, 8.3 percent for grounds, and 53 percent for utilities. There is also a waste handling budget of $204,860 that is not included with the Maintenance and Operations budget.

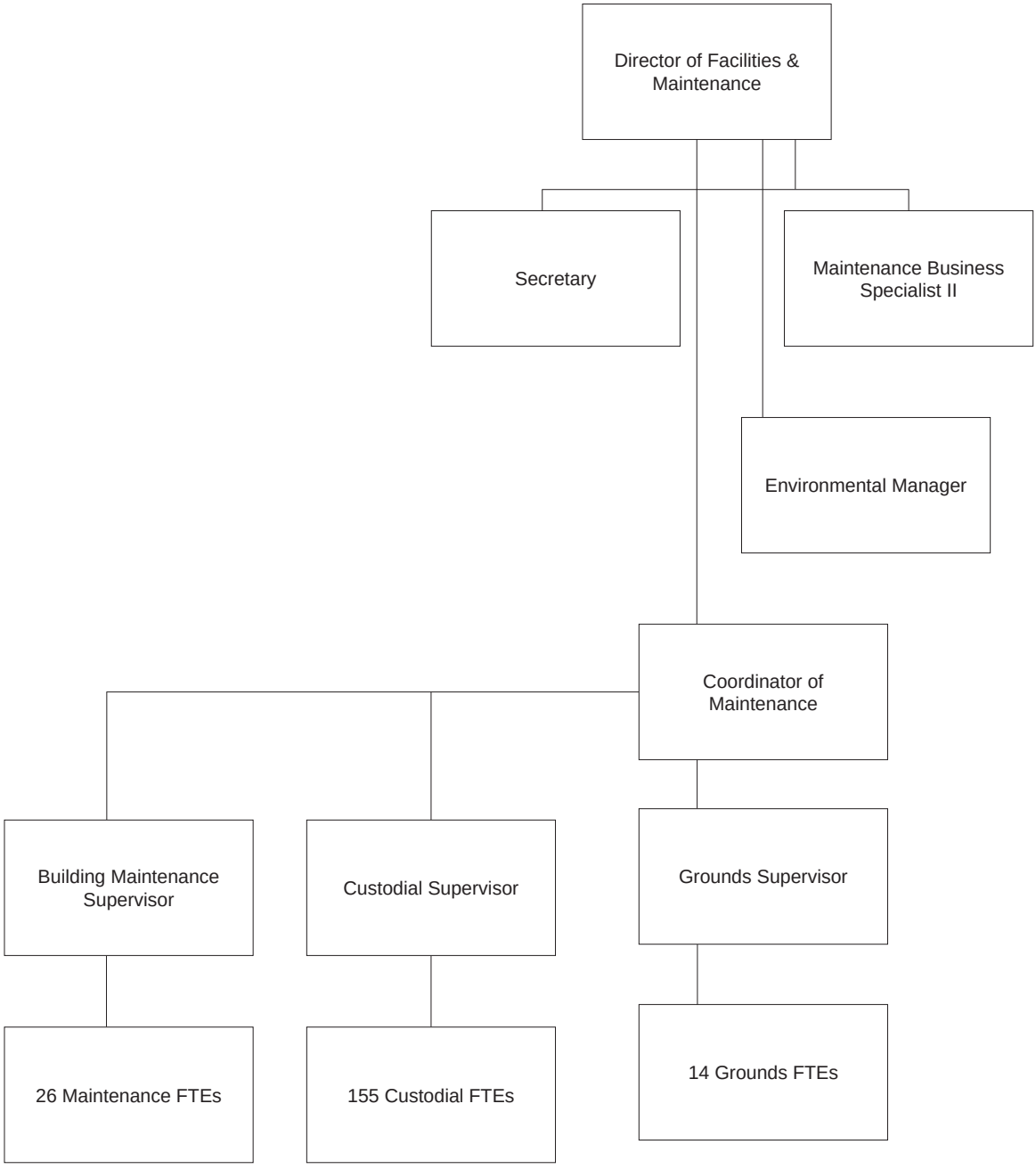
In 2008, WISD passed a bond initiative in the amount of $172.5 million which has allowed the district to make multiple improvements to facilities. The district has focused

EXHIBIT 5–2
WISD BUILDING INVENTORY
2011–12

FACILITY	YEAR BUILT	GROSS SQUARE FEET (GSF)
Administration Building	1929	71,469
A.J. Moore Academy	1970	158,569
Alta Vista Montessori	1910	48,948
Waco ISD Alternative School	1920	66,012
Brazos Middle	1936	99,654
Brook Avenue Elementary	1999	43,260
G.W. Carver Academy	1958	127,487
Cedar Ridge Elementary	1954	51,664
Cesar Chavez Middle	2003	80,000
Crestview Elementary	1951	72,762
Dean Highland Elementary	2011	90,775
Doris Miller Elementary	1963	49,669
Challenge Academy	1940	19,334
Hillcrest Professional Development	1953	41,466
J.H. Hines Elementary	2010	79,240
Kendrick Elementary	1952	60,059
Lake Air Intermediate	1957	121,148
Lake Waco Montessori	1953	56,578
Maintenance Shops and Warehouse	NA	11,280
Meadowbrook Elementary	1956	43,812
Mountainview Elementary	1957	49,830
North Waco Elementary	1968	52,679
Parkdale Elementary	1960	58,364
Provident Heights Elementary	1999	43,260
South Waco Elementary	1988	68,400
Waco ISD Sports Complex	2000	7,920
Sul Ross Elementary	1952	46,750
Tennyson Middle	1960	95,610
Transportation Services	NA	1,500
University High School	2011	355,513
University Middle	1953	286,760
Viking Hills Elementary	1968	39,577
Waco High	1961	410,386
West Avenue Elementary	2001	50,579
G.L. Wiley Building	1938	69,908
Texas Playhouse	1998	3,096
S.T.A.R.S High School	1960	2,670
Early Childhood Development Center	1960	19,697
Old Doris Miller YMCA Building	1971	19,461
Total Gross Square Feet (GSF)		**3,075,146**

SOURCE: WISD Facilities and Maintenance Department, 2011.

EXHIBIT 5–3
WISD FACILITIES AND MAINTENANCE DEPARTMENT ORGANIZATION
2011–12



NOTE: The Athletic Crew (5 FTEs) are assigned to the Athletic Director and do not appear on the organization chart. In addition, 90 percent of the Custodial FTEs have a dual reporting structure, and report directly to the principal at their campus.
SOURCE: WISD Facilities and Maintenance Department, September 2011.

EXHIBIT 5–4
WISD SUMMARY OF MAINTENANCE AND OPERATIONS BUDGET
2011–12

BUDGET LINE ITEM	2011–12 BUDGET
Maintenance	
Maintenance Salaries and Benefits	$1,383,833
Misc. Contracted Services	$1,364,845
Materials and Supplies	$560,561
Equipment	$31,500
Utilities	$114,789
Maintenance Subtotal	**$3,455,528**
Custodial Services	
Custodial Salary and Benefits	$350,610
Misc. Contracted Services	$147,000
Materials and Supplies	$100,763
Equipment	$62,000
Custodial Subtotal	**$660,373**
Grounds	
Grounds Salaries and Benefits	$497,542
Misc. Contracted Services	$84,240
Materials and Supplies	$71,500
Grounds Supplies	$142,040
Equipment	$83,000
Grounds Subtotal	**$878,322**
Utilities	
Electric	$4,480,612
Natural Gas	$290,972
Water Service	$628,736
Telephone	$249,923
Utilities Subtotal	**$5,650,243**
Operations and Maintenance Total	**$10,644,466**

SOURCE: WISD Detail Budget Status Report by Organization, November 21, 2011.

the bond money on six major projects that include renovations to existing facilities and construction of four new facilities (**Exhibit 5–5**). At the time of onsite work in November 2011, the district reported that less than $3 million remains. To help determine the best way to allocate those funds, WISD has used a combination of both in-house and contractor technical expertise.

During school year 2011–12, the district went through the process of discussing, reviewing, and then approving school consolidation and repurposing plans. Multiple plans were presented to and discussed by the Board of Trustees (board) throughout the school year. The superintendent presented a final recommendation to the board on February 14, 2012. The plan cut $3.4 million from the district's budget, and recommended closing multiple campuses (four elementary schools, two middle schools, and one high school), merging several campuses, and altering attendance zones.

EXHIBIT 5–5
NEW SCHOOL CONSTRUCTION AND RENOVATIONS
2008–09 TO 2010–11

DESCRIPTION	AMOUNT BUDGETED (IN MILLIONS)
New School Construction:	
University High School	$86.8
Bell's Hill Elementary	$16.9
Dean Highland Elementary	$16.4
J. H. Hines Elementary	$16.9
Laboratory and cafeteria renovations (Waco H.S. and A.J. Moore H.S.)	$14.3
Miscellaneous renovations, repairs and upgrades	$15.8
Contingencies	$5.0
Total new construction and renovations	**$172.5**

SOURCE: WISD Business Office, 2011.

The board approved the school closure and consolidation recommendations on February 23, 2012. The final plan includes closing the following campuses upon completion of school year 2011–12: Viking Hills Elementary, Sul Ross Elementary, Meadowbrook Elementary, North Waco Elementary, Lake Waco Montessori, Brazos Middle, University Middle, Waco Alternative School, and S.T.A.R.S High School. Additionally, a new consolidated middle school will open on the current A.J. Moore campus and high school students enrolled in the academies at A.J. Moore will be relocated to University High School. The ROTC program from A.J. Moore Academy will be moved to Waco High School. Finally, Lake Air Intermediate campus will be closed as an intermediate campus and repurposed as the District Montessori campus. The board planned to redraw attendance zones in March 2012.

ACCOMPLISHMENT

- Initiatives have been undertaken to improve capital planning and budgeting through the completion of facility condition assessments and initial development of a facilities master plan.

FINDINGS

- WISD has not established standards or methods for determining maintenance, custodial, and grounds staffing levels.
- WISD's preventive maintenance program is insufficient to provide good long-term stewardship needed to preserve the district's facilities.
- WISD lacks organization of its facilities data and information.
- WISD lacks a consistent understanding and implementation of an official energy management program in the district.
- WISD has not developed performance measures to evaluate its facilities and maintenance operations.

RECOMMENDATIONS

- **Recommendation 21: Develop staffing models for maintenance, custodial, and grounds staff.**
- **Recommendation 22: Implement a formal, proactive, and documented comprehensive preventive maintenance program.**
- **Recommendation 23: Dedicate efforts to implement the enhancements of the existing computerized maintenance management system to help optimize, organize, streamline, and document operations and maintenance efforts.**
- **Recommendation 24: Develop an energy management program to conserve energy and reduce costs.**
- **Recommendation 25: Develop a limited number of key performance indicators to measure performance and show stakeholders areas of improvement and accomplishments.**

DETAILED ACCOMPLISHMENT

FACILITY CAPITAL PLANNING

Initiatives have been undertaken to improve capital planning and budgeting through the completion of facility condition assessments and initial development of a facilities master plan.

In 2004, the district internally established "The Big List" which documented the inspections of all campuses by maintenance staff and the types of repairs necessary at that time. The planning effort also consisted of reviewing enrollment projections and developing alternative scenarios of schools and school configurations to meet the needs of the school district. As noted in the Facility Master Plan document (July 2011), in 2006 the Facility and Maintenance Department began to develop an improvement and repair plan to meet the growth and technology challenges experienced by the district. The basis of the current plan is the facility condition assessment (FCA) report performed by 3D/I, a contracted assessment firm. The FCA report identified several deficiencies and building renewal needs. Some of the deficiencies and needs included life safety concerns, barriers to accessibility, security needs, and 'antiquated' mechanical and electrical infrastructure. Immediate and longer-term needs were identified. The architectural firm PBK was hired to take an additional look at the facilities from an architectural perspective in consideration of the FCA to develop a plan of action.

Review of the district's plan indicate that the facilities master plan document is intended to provide an integrated program and a context for action planning and long term funding strategies to deliver the proper facilities when required. While development of the final master plan is still underway, the district has taken a good first step by establishing a blueprint for the Facilities and Maintenance Department. Continued development of the plan gives the district an opportunity to enhance the effectiveness of the overall maintenance and minimize the costs of maintaining facilities.

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

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

DETAILED FINDINGS

EVALUATE STAFFING LEVELS (REC. 21)

WISD has not established standards or methods for determining maintenance, custodial, and grounds staffing levels. The district did not provide the review team with any written or verbal staffing guidelines for decision-making for maintenance and grounds staffing. According to interviews, current staffing levels are based on historical staffing levels and WISD senior leadership's experience with school operations.

Analysis by the review team shows the district's ratio of maintenance staff to gross building area maintained per Full-Time Equivalent (FTE) is 118,275:1 (GSF/FTE) based on information provided by the district. The standard published in the *American School and University (AS&U) Maintenance & Operations Cost Study* (April 2008) is 79,293:1 GSF/FTE. During interviews, district staff indicated that WISD uses contractors to supplement the maintenance staff; however, the district was unable to provide information to the review team regarding the overall amount of contracted employees used. Therefore, the review team was unable to make a precise assessment regarding the maintenance staffing levels in the district.

Analysis of custodial staffing in WISD found that the custodial services group may be overstaffed. Using data provided, the review team determined that the custodial group of 142 FTEs (which excludes 11 custodians in the substitute pool and two supervisors) maintains the same amount of building area, which translates to about 21,656 GSF/FTE. Industry standards for custodial cleaning have ranged from 21,000 GSF/FTE in an Association of Higher Education Facilities Officers (APPA) study to 32,100 GSF/FTE reported in the AS&U Cost Study. Taking the average of the two recommended levels produces a result of 26,550 GSF/FTE, which is the standard the review team used for comparison. The custodial staffing of 21,656 GSF/FTE is less than the average of 26,550 GSF/FTE.

Further, analysis by the review team found that the grounds crew, the third staff section of the Facilities and Maintenance Department, may be overstaffed. Information provided by the district shows a grounds crew of 14 FTEs maintains 480 acres, which translates to about 34 acres/FTE. This amount is less than the median average of 39 acres/FTE reported in the AS&U Cost Study. However, it is important to note that the district indicated the grounds crew FTE count includes staff that spend only part of their time towards actual grounds work, and that those grounds staff save the district monies that otherwise would be contracted out at higher costs. These staff include: a welder, a machine operator, a pest control applicator, and a small engine repair person.

Based on published industry standard benchmarks, the Maintenance Department, as a whole, is slightly understaffed. The overall cost of maintenance operations is slightly higher, but in line with industry benchmarks. Published staffing benchmarks, such as those published by AS&U, are a good starting point for determining the appropriate number of FTEs; however, these staffing benchmarks do not take into account the desired level of service, appearance, and attention.

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

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

The basis for the custodial staffing analysis is cleanable area per FTE by space type standard and type of finishes for various appearance levels. Primary APPA space standards

include: classrooms, entranceways and public circulation, administrative offices, laboratories, stairwells, washrooms, utility/storerooms, cafeterias, libraries, auditoriums, gymnasiums, and health care (patient treatment areas).

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

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

There are also levels of service matrices for custodial services and grounds operations. It appears that the custodial services at WISD school buildings are currently being performed at appearance Level 2, Orderly Tidiness – as outlined in **Exhibit 5-7**. This level is the recommended level for school facilities.

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

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

The optimal level of maintenance for a curriculum-based facility should be a Level 2 - Comprehensive Stewardship (see **Exhibit 5–6**). Maintaining current staffing levels will only yield between a Level 3— Managed Care and Level 4 —Reactive Management. Because of the age of the facilities, the Facilities and Maintenance department has been able to provide primarily reactive maintenance and service with fewer staff. As the facilities continue to age, the same level of service will be unachievable without the appropriate increase in staff.

WISD should develop staffing models for maintenance, custodial, and grounds staff. As part of the process, the district should use benchmark guidelines as a first step and then possibly refine staffing resources using APPA level of service models, if needed. A comparison of current staffing levels and workloads to benchmark standards may result in a potential for annual savings through more effective allocation, planning, and utilization of staff.

If the district applies an industry standard (26,550 GSF/ FTE) for custodial staffing levels, custodial staffing levels would result in a reduction of up to 26 FTEs while still maintaining the same level of service. Thus, the fiscal impact estimates a potential for annual savings of approximately $459,680 (26 FTEs x $17,680, based on $14,492 average salary + 22 percent estimated benefits rate) beginning in school year 2013–14. This reduction of custodial staffing could be phased in over a period of time to allow the district to develop staffing models in school year 2012–13 and use attrition and retirement of custodial staff.

EXHIBIT 5–6
APPA MAINTENANCE STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES

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

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

LEVEL	1	2	3	4	5
DESCRIPTION	SHOWPLACE FACILITY	COMPREHENSIVE STEWARDSHIP	MANAGED CARE	REACTIVE MANAGEMENT	CRISIS RESPONSE
Facility Maintenance Operating budget as % of CRV	>4.0	3.5-4.0	3.0-3.5	2.5-3.0	<2.5
Campus Average FCI	<0.05	0.05-0.15	0.15-0.29	0.30-0.49	>0.50

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

EXHIBIT 5–7
APPA CUSTODIAL STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES

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

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

EXHIBIT 5–8
APPA GROUNDS STAFFING GUIDELINES FOR EDUCATIONAL FACILITIES

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

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

LEVEL	1	2	3	4	5
DESCRIPTION	STATE-OF-THE-ART MAINTENANCE	HIGH-LEVEL MAINTENANCE	MODERATE LEVEL MAINTENANCE	MODERATELY LOW-LEVEL MAINTENANCE	MINIMUM LEVEL MAINTENANCE
Repairs	Repairs to all elements of the design should be done immediately.	Should be done whenever safety, function, or appearance is in question.	Should be done whenever safety or function is in question.	Should be done whenever safety or function is in question.	Should be done whenever safety or function is in question.
Inspections	A staff member should conduct inspection daily.	A staff member should conduct inspection daily.	Inspections are conducted once per week.	Inspections are conducted once per month.	Inspections are conducted once per month.
Floral Plantings	Maximum care, including watering, fertilizing, disease control, debudding, and weeding is necessary. Weeding is done minimum once per week.	Care cycle is usually at least once per week, but watering may be more frequent. Bed essentially kept weed free.	Only perennials or flowering trees or shrubs.	None.	None.

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

PREVENTIVE MAINTENANCE PROGRAM (REC. 22)

WISD's preventive maintenance program is insufficient to provide good long-term stewardship needed to preserve the district's facilities. The current maintenance program consists mainly of breakdown maintenance, corrective actions, responding to work requests, periodic heating, ventilation, and air conditioning (HVAC) inspection, and filter replacements. During onsite interviews, the director of Facilities and Maintenance reported most of the department's work was in response to requests and corrective in nature. Additionally, analysis by the review team found that the Facilities and Maintenance Department appears to operate generally in a reactive mode. There was very little evidence of completed preventive maintenance on any equipment beyond the packaged HVAC equipment. Continuing to neglect an investment in a formalized maintenance program will result in inordinate expenditures and a shortened useful life of building systems and schools.

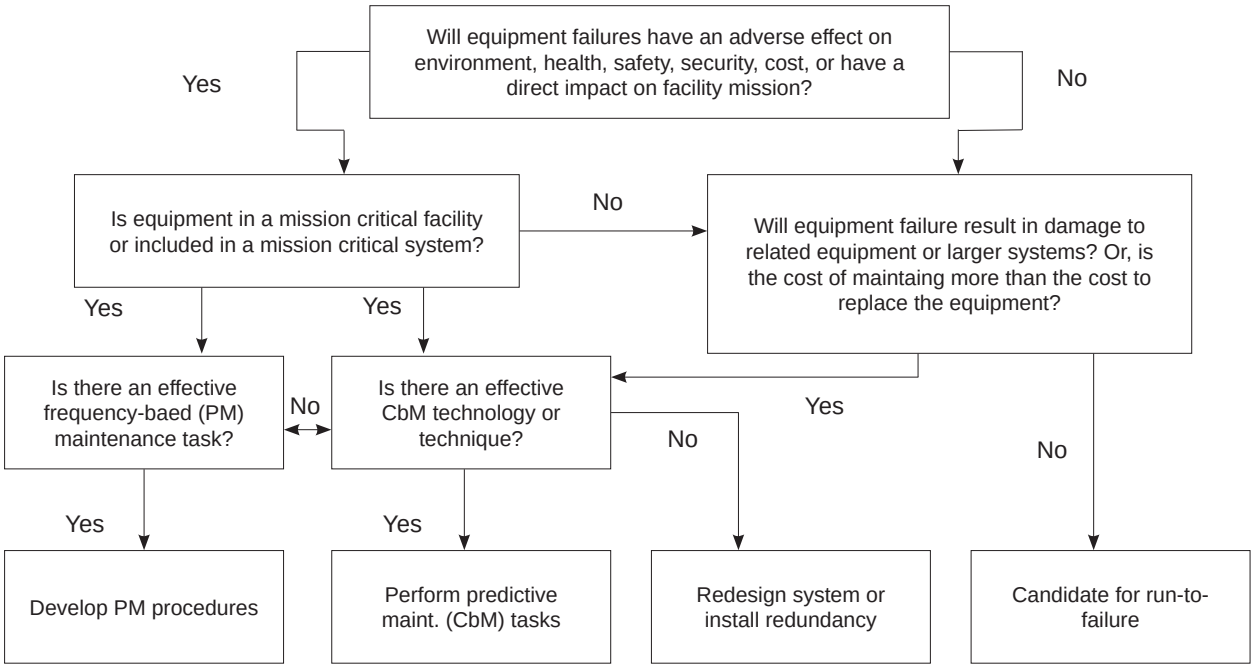
With few exceptions, preventive maintenance (PM) has been considered the most effective way of maintaining building systems and extending the service life of equipment. Most PM programs are based on the assumption that there is a cause and effect relationship between scheduled maintenance and system reliability. The primary assumption is that mechanical parts wear out; thus, the reliability of the equipment must be in direct proportion to its operating age. Research has indicated that operating age sometimes may have little or no effect on failure rates. There are many different equipment failure modes, only a small number of which are actually age or use-related. Reliability Centered Maintenance (RCM) was developed to include the optimal mix of reactive-based, time- or interval-based, and condition-based maintenance.

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

The district should implement a formal, proactive, and documented comprehensive preventive maintenance program. The right type of maintenance for various equipment types can be determined by following a logic-tree decision-making process as shown in **Exhibit 5–9**.

To develop a comprehensive preventive maintenance program, WISD Facilities and Maintenance management staff should begin by identifying systems and components, prioritizing maintenance activities, developing job plans, and estimating job plan completion times. The existing inventory

EXHIBIT 5–9
MAINTENANCE DECISION TREE



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

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

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

Step 2: Prioritizing Maintenance Activities—Once the facilities data has been compiled, the maintenance decision tree described in **Exhibit 5–9** can be applied to help determine to what level each piece of equipment should be maintained. Equipment to be included in the maintenance program should be selected based on the cost of performing advanced maintenance weighed against the cost impact of deferring the maintenance.

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

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

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

Maintenance tasks should be based on manufacturer's recommendations and/or job plans developed by industry standard publications such as R.S. Means, General Services Administration (GSA), or Whitestone, and adapted based on

EXHIBIT 5–10
CRITICALITY/SEVERITY CATEGORIES

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

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

experience. Detailed tasks, performance times, and frequencies by equipment type should be developed. Care should be taken to format the tasks in a method for future uploading into a computerized maintenance management system (CMMS).

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

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

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

FACILITY MANAGEMENT INFORMATION TECHNOLOGY (REC. 23)

WISD lacks organization of its facilities data and information. There is no inventory of major maintainable building systems and equipment in the Computerized Maintenance Management System (CMMS). Additionally, an inventory of maintainable equipment was not mentioned during interviews with facilities-related staff. The absence of an inventory makes the operation of any sort of Preventive Maintenance (PM) program extremely difficult.

While the district does make use of a CMMS, SchoolDude, its level of implementation is minimal. In August 2011, the director of Facilities and Maintenance developed a report on the district's use of its CMMS. The report notes that the district had access to three functions—Facility Operations, Administrative Operations, and Technology Operations—within the system; however, at that time, the district used only one function (Facility Operations) to manage building operations. The Facilities Operations function consists of work order management, preventive maintenance scheduling, wireless work order management, and inventory management. Of the features available in the Facility Operations function, the district reported using the Maintenance Direct and PM Direct features only.

A CMMS is a type of facility management information technology that handles work management processes. CMMS are much more efficient at managing requests through their life-cycle when compared to paper-based tracking tools. Their purpose is to automate and manage work requests as efficiently as possible and provide the basic information districts need to make informed and timely decisions. The benefits of automation include: better data management, increased efficiency, better tracking of asset/equipment histories, and organized facilities and maintenance (FM) data and information.

Implementation of an automated work order system requires careful forethought and development of data standards to ensure long-term usability of the system. Many CMMS and computer-aided facility management (CAFM) systems fail because the data is not standardized and maintainable. Proper implementation and the use of data standards will lead to valuable and effective information and work management systems. Because there is limited use of the CMMS at WISD, there is an opportunity to seek improvement.

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

The district should dedicate efforts to implement the enhancements of the existing CMMS to help optimize, organize, streamline, and document operations and maintenance efforts. This process should also include entering a complete inventory of major maintainable building equipment into the CMMS. Such a system and data will help minimize redundant effects, better track assets and inventory, support maintenance decision-making, and provide data for facilities performance indicators. Additionally, the district should consider how to use the Administrative Operations and Technology Operations functions of the CMMS. These functions could help the district with areas such as facility use planning, utility tracking and analysis, and information technology asset management.

Best practices show that the most successful CMMS implementations are those where the facility manager had a sound strategic facility management information technology plan, automated broadly, emphasized training, did not try to over-populate the system, had good internal electronic communication in place, had a dedicated automation manager, had buy-in from top to bottom of the organization, understood all costs, and maintained good administrative procedures. Therefore, as a first step, the Facilities and Maintenance director should develop a facility management information technology plan to provide the long-term focus needed to successfully implement a system and ensure that it supports facility business processes. The August 2011 report on the district's implementation of its CMMS provides a starting point for development of a plan. The following questions may further guide the development of a strategic facility management information technology plan:

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

This recommendation can be implemented with existing resources.

ENERGY MANAGEMENT AND SUSTAINABILITY PLANS (REC. 24)

WISD lacks a consistent understanding and implementation of an official energy management program in the district. A review of district policy by the review team found that Board Policy CL (LEGAL) established a long-range energy plan to reduce the district's annual electric consumption by 5 percent beginning with the 2008 state fiscal year. Board Policy CL (LOCAL) further defines the district's energy conservation philosophy and also establishes that energy management is a joint responsibility of the board, administrators, teachers, students and support personnel in the district. Additionally, the policy states that campus principals "shall be accountable for energy management on the campus with annual energy audits being conducted and conservation program outlines being updated." However, during interviews, the WISD superintendent mentioned that the official energy policy included a targeted 3 percent per year reduction of energy consumption over the next five years to achieve a total of 15 percent energy use reduction over that period. The energy targets mentioned by the superintendent differ from the official target established by board policy.

As another step towards establishing an energy management program, WISD engaged the State Energy Conservation Office (SECO) in 2009 to complete an Energy Efficient School Partnership Service Report (SECO report). The report identified energy performance of district facilities by analyzing utility bills to determine the annual energy cost and energy consumption of school facilities. Additionally, the SECO report identified opportunities for the district to improve their energy efficiency, including establishing an Energy Management Department, giving feedback to principals on their campuses' energy use, and adopting a district energy conservation policy. While WISD has established the foundations for energy management practices by establishing official board policy and engaging an outside party to examine energy usage, the district still lacks an official energy manager and formal documented energy management program.

A successful energy management program requires support and prioritization from the board and superintendent. The first step toward developing an energy-efficient school operation is evaluating current energy consumption of district facilities. The 2009 SECO report provides data regarding the district's energy usage in the past. Analysis of utility bills for the 2009 SECO report summarized energy cost indexes (ECI), the sum of the annual electrical and natural gas costs divided by the total school area, for seven campuses over school year 2007–08. The average ECI for the seven campuses was reported to be $1.79 per square foot. Additionally, the review team's evaluation of current energy (i.e., electricity and natural gas) consumption indicated an average ECI across all WISD campuses of about $1.55 per SF. Typical annual energy cost benchmarks for schools on an annual basis are reported to be about $1.25 per SF. Thus, WISD facilities still consume 24 percent more energy than cost benchmark for school facilities. Detailed breakdown of ECIs for elementary, middle, and high schools for 2011–12 are shown in **Exhibits 5–11** through **Exhibit 5–13**.

While the 2009 SECO report noted high energy consumption by the district, it also acknowledged that WISD was paying attention to energy use and was undertaking some initiatives to reduce energy costs, including:

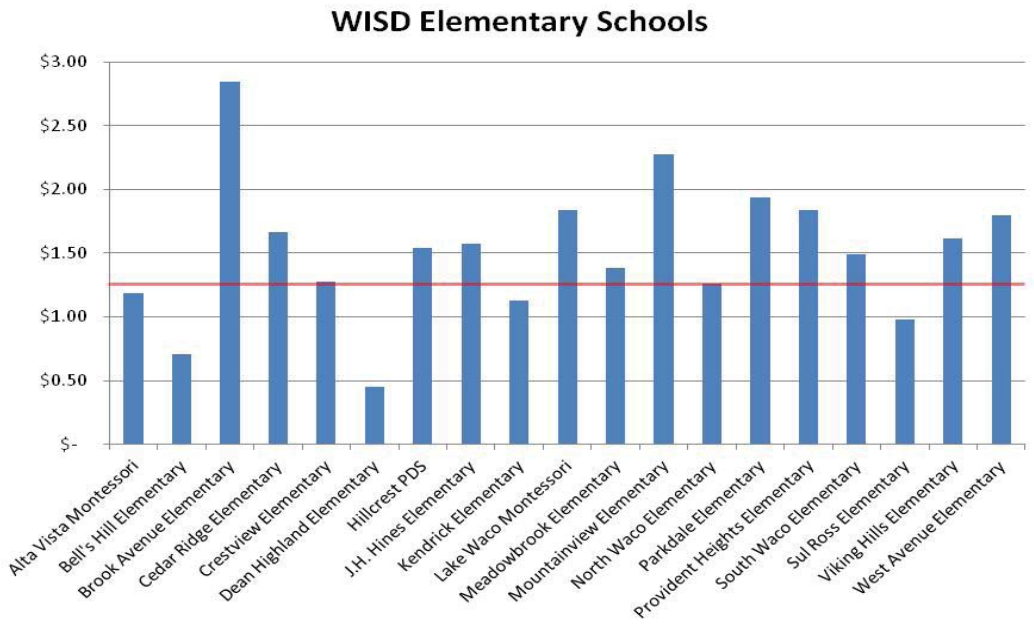
- Retrofitting campuses with energy-efficient electronic ballasts and T-8 lamps; and
- Installing energy management systems and controls at some campuses.

While some smaller energy conservation projects have been undertaken, WISD has a great opportunity for potential energy management and conservation. Texas Education Code Section 44.902 states the following: LONG-RANGE ENERGY PLAN TO REDUCE CONSUMPTION OF ELECTRIC ENERGY. (a) The board of trustees of a school district shall establish a long-range energy plan to reduce the district's annual electric consumption by 5 percent beginning with the 2008 state fiscal year and consume electricity in subsequent fiscal years in accordance with the district's energy plan.

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

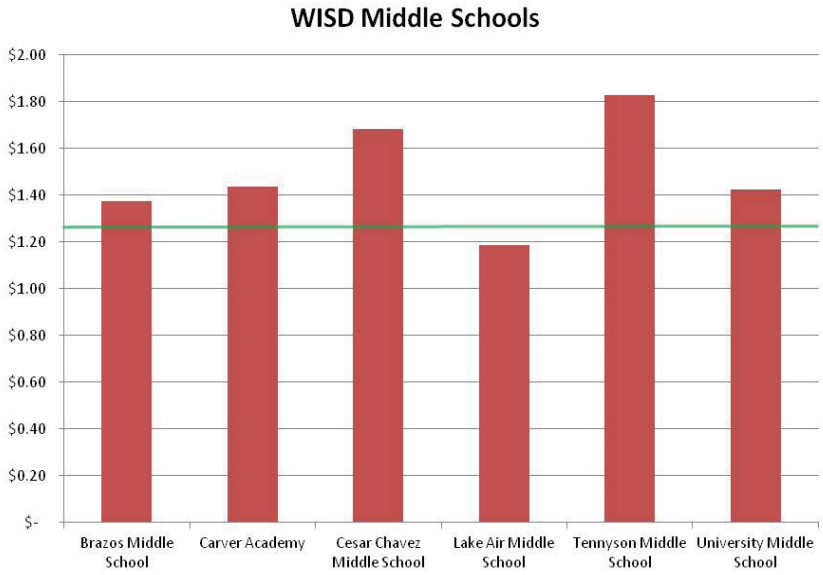
WISD should develop an energy management program to conserve energy and reduce costs. Development of a program will involve several steps, including reviewing and potentially revising board policy, developing an energy conversation and management plan, and determining the efficiency and performance of district buildings.

EXHIBIT 5–11
ENERGY COST DATA PER SQUARE FOOT (SF) - WISD ELEMENTARY SCHOOLS
2011–12



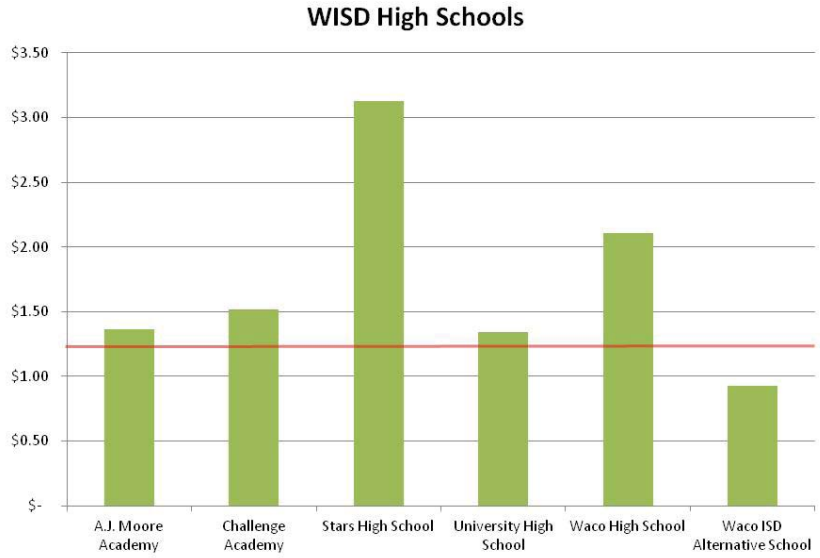
SOURCE: WISD 2011–12 Utility Projections (Electricity and Natural Gas Costs).

EXHIBIT 5–12
ENERGY COST DATA PER SQUARE FOOT (SF) - WISD MIDDLE SCHOOLS
2011–12



SOURCE: WISD 2011–12 Utility Projections (Electricity and Natural Gas Costs).

EXHIBIT 5–13
ENERGY COST DATA PER SQUARE FOOT (SF) - WISD HIGH SCHOOLS
2011–12



SOURCE: WISD 2011–12 Utility Projections (Electricty and Natural Gas Costs).

As a first step, the district should review current Board Policy CL (LEGAL) and (LOCAL) to determine whether the policy should be revised to support the district's goals. As industry best practices show, policy should be established by the board and senior management and should include general guiding statements and specific energy conservation and building management guidelines. After reviewing and potentially revising district policy, the next step is to develop an energy conservation and management plan based on baseline energy audits. The district could consider developing the plan in conjunction with an energy management consulting firm if there is a lack of resources and specific energy management expertise in WISD. The conservation efforts should focus on reduction of usage without additional major capital investments.

In conjunction with development of an energy conservation and management plan, the district should determine the efficiency and performance of district buildings. While the information provided in the 2009 SECO report and within this chapter provides the district with baseline energy consumption statistics, it is important for WISD administrators to know which buildings are the least efficient and the performance of each building at different periods of times during the year. Industry practices show that there are several ways to accomplish this task. Ideally, the district could install metering that could track such data on a much more frequent basis.

However, in the absence of such technology, the district needs a qualified energy manager to oversee the implementation of energy conservation measures (ECMs) and track energy conservation results to the targeted goals. This individual would be given the responsibility for the manual recording of such data on a pre-determined schedule. That data could then easily be populated into a fairly simple energy management software application or worksheet. There are several commercially available software applications or even simple spreadsheets could be used. Additionally, the person in charge of energy conservation programs will be able to share results with school principals, the director of Facilities and Maintenance, and other key individuals, much like a report card.

To implement this recommendation, WISD should assign the energy manager responsibilities to the environmental manager position. Although this position was vacant at the time of onsite work, the district was actively advertising to fill this position. To ensure that energy management responsibilities are assigned to the environmental manager, the district should revise the job description of the environmental manager position to include responsibilities

such as overseeing the implementation of ECMs and tracking energy conservation results to the targeted goals.

This recommendation can be implemented with existing resources.

OPERATIONS AND MAINTENANCE PERFORMANCE MEASUREMENT (REC. 25)

WISD has not developed performance measures to evaluate its facilities and maintenance operations. The district maintains very little data for the development of operations and maintenance performance measures. Thus, it is very difficult to show the successes of the Facilities and Maintenance Department.

The development of sound data information standards and automating processes enhances facilities performance measurement and the accuracy of Key Performance Indicators (KPI). The objectives of automating work processes are, after all, to increase performance, measure facilities performance, and provide better information to make the best decisions regarding facilities.

The current performance measurement at WISD is limited in scope and requires time-consuming manual data generation through the use of spreadsheets. The performance measurement data provided to the review team included general budget information and school district target data. This data consisted of very limited benchmark information regarding operational costs and capital expenditures per square foot. Districts have great opportunities to improve facilities performance through the development of more specific KPIs aligned with the mission and vision of their district.

Measuring facilities operation's performance in today's environment is the route to credibility. The focus must be on prevention, not cure, and there must be recognizable goals and achievable prioritized objectives. Metrics provide essential links between strategy, execution, and ultimate value creation.

There are many ways of identifying and developing metrics and KPIs for use in school facilities management performance measurement. It is also easy to find samples of hundreds of potential facility maintenance metrics. However, it is not easy to identify and implement the right metrics to link facility operations and maintenance to strategy. The right KPIs should focus on those services that have the most prominent place in WISD's strategic plans. The right mix of KPIs should consider all three aspects of facilities performance:

- Inputs: Indicators that measure the financial, staffing, portfolio condition, and operating impacts from limited budgets/resources and construction and renovation activities;
- Process: Indicators that measure how efficiently the department is performing its key process and tasks; and
- Outcomes: Indicators that provide a measure of how successfully the facilities function is performing.

Educational organizations at the forefront of their industry have developed best practices by using a balanced scorecard approach to KPIs. The balanced scorecard is an approach that integrates financial and non-financial performance measures to show a clear linkage between the institution's goals and strategies. Most balanced scorecards consider four perspectives: customer perspective, process perspective, learning and growth perspective, and a financial perspective. The framework set by the balanced scorecard approach provides an excellent methodology to measure overall performance as facilities managers.

EXHIBIT 5–14
KEY PERFORMANCE INDICATORS

Input Measures:

- FCI of building inventory (% DM/CRV);
- maintenance staffing levels (# of FTEs);
- operations funding ($/GSF); and
- capital project funding ($).

Process Measures:

- work orders by type;
- top 10 work order problem codes;
- staff utilization rates;
- PM completion rate (%);
- PM / CM mix (%);
- utility cost/GSF ($/GSF);
- re-work percentage (%);
- work order turn-around time (days); and
- annual building inspections completed (%).

Outcome Measures:

- cost of operations ($/GSF);
- custodial inspection scores (#);
- change in FCI (%);
- customer Satisfaction (%); and
- budget Performance (%).

SOURCE: Developed by the Review Team, 2011.

A listing of potential KPIs is presented in **Exhibit 5–14**.

WISD's director of Facilities and Maintenance should develop a limited number of key performance indicators to measure performance and show stakeholders areas of improvement and accomplishments. This task can be accomplished in coordination with the assistant superintendent of Business and Support Services to ensure alignment with the mission and strategic objectives of WISD. The relevant KPIs drawn from the best practice list shown in **Exhibit 5–14** should be identified over the span of a couple of meetings. The next step is to determine the data required to generate the metrics and how to collect the data. Use of the district's CMMS can aid in the collection and reporting of the data to generate the KPIs.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
21. Develop staffing models for maintenance, custodial, and grounds staff.	$0	$459,680	$459,680	$459,680	$459,680	$1,838,720	$0
22. Implement a formal, proactive, and documented comprehensive preventive maintenance program.	$0	$0	$0	$0	$0	$0	$0
23. Dedicate efforts to implement the enhancements of the existing computerized maintenance management system to help optimize, organize, streamline, and document operations and maintenance efforts.	$0	$0	$0	$0	$0	$0	$0
24. Develop an energy management program to conserve energy and reduce costs.	$0	$0	$0	$0	$0	$0	$0
25. Develop a limited number of key performance indicators to measure performance and show stakeholders areas of improvement and accomplishments.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 5	**$0**	**$**459,680	**$**459,680	**$**459,680	**$**459,680	**$1,838,720**	**$0**

CHAPTER 6

ASSET AND RISK MANAGEMENT

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 6. ASSET AND RISK MANAGEMENT

The public entrusts school districts with assets for use in educating children. School districts receive taxpayer dollars, federal and state grants, and other revenue from a variety of sources, but each of these sources expect the school district to be accountable for how those revenue dollars are used. It is incumbent upon each school district to steward carefully the scarce resources it receives, to prevent loss, and to ensure the achievement of the educational goals established by the district's Board of Trustees.

The policies, processes and procedures that form the district's asset and risk management program should be designed and implemented to track, manage and safeguard its assets, including financial assets such as cash and investment securities, as well as non-liquid assets such as property and equipment. School district officials with responsibilities for asset and risk management must constantly balance the need to protect the district's assets with the costs associated with that protection.

For example, Waco Independent School District (WISD) has over $120 million of investment securities. One objective of the asset and risk management function must be to maximize the return on these investments, while at the same time safeguarding these invested assets to prevent loss in value. Another example is insurance protection. The district's risk manager should coordinate the various insurance products that the district purchases to provide reasonable coverage of foreseeable risks, while at the same time controlling the costs of related premiums.

The Asset and Risk Management function (ARM) aims to control costs by ensuring that the district is adequately protected against all significant losses with the lowest possible insurance premiums. WISD employs policies and procedures to ensure that all revenues are collected and that district assets—cash and other financial assets, equipment, and property – are safeguarded.

The assistant superintendent for Business and Support Services has primary responsibility for managing the district's long-term debt, including oversight for bond issuances and investments in capital assets. Since 2008, WISD has issued approximately $172 million in new school building bonds and $14 million of refunding bonds. **Exhibit 6–1** shows the summary of long-term debt issuances and retirements for the four fiscal years ending August 31, 2011.

Since 2008, WISD has maintained a stable financial position emphasizing the liquidity of its assets and the increases in undesignated fund balance. **Exhibit 6–2** presents the financial position of WISD and its peers at the end of fiscal year 2010 (at the time of the review, the most recent year for which TEA provides summarized financial information). Peer districts are districts similar to WISD that are used for comparison purposes. As seen in **Exhibit 6–2**, WISD exceeds

EXHIBIT 6–1
WISD LONG-TERM DEBT SUMMARY
FISCAL YEARS 2008 TO 2011

DESCRIPTION	2008	2009	2010	2011	CUMULATIVE
Beginning balances	$55,117,784	$178,346,353	$220,220,008	$213,980,490	$55,117,784
Issued: Construction	126,405,000	45,500,000			171,905,000
Issued: Refunding	6,265,000		7,575,000		13,840,000
Other Increases*	1,933,936	1,706,748	482,181	329,617	4,452,482
Total Increases	**134,603,936**	**47,206,748**	**8,057,181**	**329,617**	**190,197,482**
Retirements	(11,290,000)	(5,165,000)	(14,190,000)	(5,635,075)	(36,280,075)
Other decreases*	(85,367)	(168,093)	(106,699)	(866,025)	(1,226,184)
Total Decreases	**($11,375,367)**	**($5,333,093)**	**($14,296,699)**	**($6,501,100)**	**($37,506,259)**
Ending Balances	**$178,346,353**	**$220,220,008**	**$213,980,490**	**$207,809,007**	**$207,809,007**

*Other increases and decreases include deferred premiums and accretions in issuance, refunding and/or retirement.
SOURCE: WISD Annual Financial Statements, 2008–11.

EXHIBIT 6–2
SUMMARY FINANCIAL INFORMATION – WISD AND PEER DISTRICTS
FISCAL YEAR 2010

	WACO	DONNA	HARLANDALE	TYLER	BRYAN
Cash and cash equivalents	**119,851,241**	33,445,816	82,146,674	86,615,870	51,291,663
Receivables	**11,797,380**	19,539,444	4,428,159	10,599,021	10,451,425
Other current	**807,516**	748,550	3,831,422	2,417,699	2,064,423
Land, buildings and equipment	**157,495,498**	137,967,470	236,039,523	227,986,537	227,137,959
Total Assets	**289,951,635**	**191,701,280**	**326,445,778**	**327,619,127**	**290,945,470**
Accounts payable	**14,888,340**	5,497,347	8,570,281	8,544,889	5,004,465
Due to/from other governments or funds	**26,158**	46,825	143,375	674	1,148,161
Accrued expenses	**4,405,686**	7,709,847	12,175,043	7,909,721	5,625,701
Long-term debt	**213,980,490**	69,260,685	210,686,342	219,926,657	165,393,788
Total Liabilities	**233,300,674**	**82,514,704**	**231,575,041**	**236,381,941**	**177,172,115**
Unrestricted Net Assets	**31,255,981**	38,242,954	21,689,725	28,237,604	40,427,832
Other net Assets	**25,394,980**	70,943,622	73,181,012	62,999,582	73,345,523
Total Liabilities and Net Assets	**289,951,635**	**191,701,280**	**326,445,778**	**327,619,127**	**290,945,470**
Cash and Cash Equivalents:					
As a percentage of Current Assets	**90.5%**	62.2%	90.9%	86.9%	80.4%
As a percentage of Total Assets	**41.3%**	17.4%	25.2%	26.4%	17.6%
As a percentage of Fund Balance	**211.6%**	30.6%	86.6%	94.9%	45.1%
Current Ratio (current assets/ current liabilities) excluding current portion of LTD	**685.6%**	405.4%	432.8%	605.5%	541.7%
Current Ratio (current assets/ current liabilities) including current portion of LTD	**530.8%**	286.6%	331.0%	362.7%	359.4%
Unrestricted portion of Fund Balance	**55.2%**	35.0%	22.9%	30.9%	35.5%
Debt Ratio (long-term debt to total net assets)	**377.7%**	63.4%	222.1%	241%	145.4%
Unrestricted fund balance to total assets	**10.8%**	19.9%	6.6%	8.6%	13.9%
Current portion of Long-term Debt	**5,635,075**	**5,493,490**	**6,421,835**	**11,012,867**	**5,974,562**

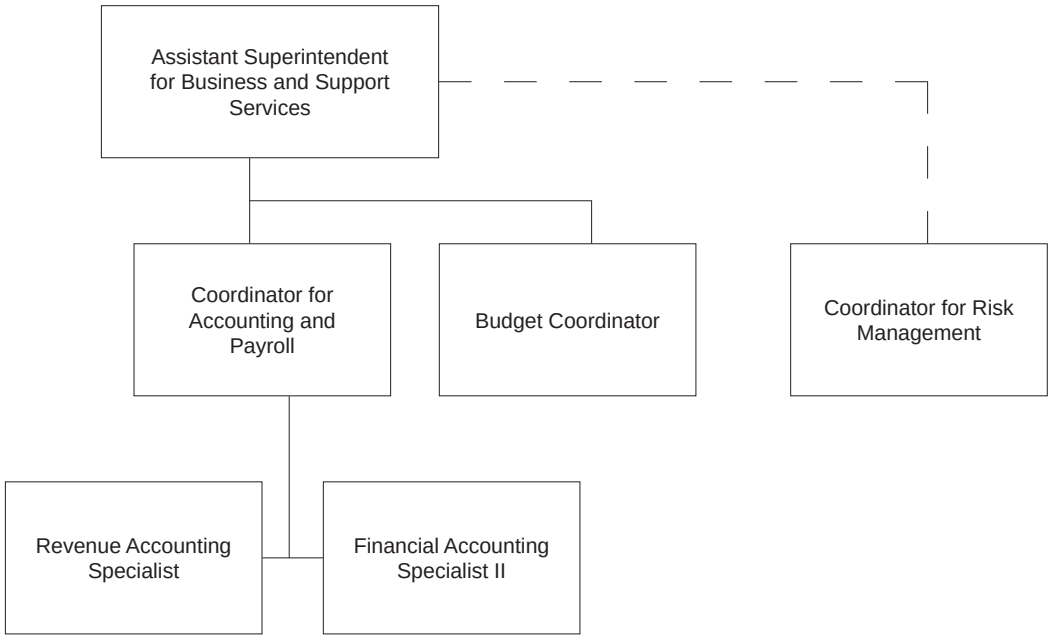
SOURCE: Texas Education Agency, Financial Reports, 2010.

its peers in all measures of liquidity (e.g., ratios of cash and investments to total current assets, total assets, and fund balance and current ratios). WISD also has the highest ratio of undesignated fund balance to total fund balance.

One measure for which WISD differs significantly with its peers is the debt ratio. The debt ratio is a financial leverage measure that provides an indication of the extent to which the district is using long-term debt, usually bonds. As noted earlier, WISD issued new construction bonds in 2008 and 2009. These bond issuances provided funds for construction of new schools; however, a portion of these funds were still invested in cash and investments at the end of fiscal year 2010.

The assistant superintendent for Business and Support Services has primary responsibility for asset and risk management in the district. The organizational structure for this purpose is depicted in **Exhibit 6–3**. The assistant superintendent for Business and Support Services acts as

EXHIBIT 6–3
ASSET AND RISK MANAGEMENT ORGANIZATION



SOURCE: WISD Business Office, November, 2011.

WISD's investment officer and is responsible for implementing the district's adopted investment policies, which are published on the WISD website, as well as maintaining compliance with the Texas Public Funds Investment (TPFI) Act. WISD's compliance with TPFI has been confirmed annually by the district's external auditor.

The coordinator for Accounting and Payroll and those accounting specialists under the coordinator's supervision report directly to the assistant superintendent. The coordinator for Risk Management reports to the executive director of Human Resources and also works with the assistant superintendent regarding insurance coverage and other risk management areas.

The revenue accounting specialist handles all accounting responsibilities for tax collections and deposits related to food services, athletics, campus and student activity funds and other areas of district revenue. The financial accounting specialist handles the reconciliation of district bank accounts under the supervision of the coordinator for Accounting and Payroll.

WISD's Business Office staff manages over 30 bank and investment accounts at various financial institutions, including general fund, payroll, activity fund and bond-related checking and savings accounts. The type and number of bank accounts maintained are typical of other Texas districts with the student enrollment and cash and investment balances similar to WISD.

The district also maintains investment accounts with entities authorized by the Public Funds Investment Act, including TexPool, TexStar, MBIA, Texas Term, and four certificates of deposit associated with its 2008 bond issue. WISD uses those banking and investment accounts typical of other Texas school districts. WISD reported total cash and investment balances (at fair value) of $149.0 million, $188.1 million, and $120.3 million as of August 31, 2008, 2009, and 2010, respectively. The district reported investment earnings for these fiscal years of $1.4 million, $4.2 million, and $1.7 million, respectively.

Each of the employees responsible for handling cash and investments also is responsible for other accounting and administrative duties. Staff members of the Business Office are not individually bonded; however, the district's property and liability insurance policy provides coverage for any wrongful acts of its employees acting within the scope of their duties.

CASH MANAGEMENT PROCEDURES

The district receives cash primarily from food service operations and campus and activity fund purposes, such as

fundraisers. Tax collections are delegated to the Office of the McClennan County Tax Assessor-Collector.

Under typical conditions, a courier service collects cafeteria and campus activity fund deposits and makes deposits to the district's general fund bank account on a daily basis. Each school, as well as the central district business office, has an overnight safe for the deposit of funds. Access to the district's safe is restricted to two employees only. Athletic event revenues are deposited by a WISD police officer at the bank's night deposit drop box.

In conformity with good internal control (i.e., appropriate segregation of duties), bank reconciliations are performed by the financial accounting specialist II, who does not have access to cash or deposits, and are reviewed by the accounting coordinator.

CASH FLOW FORECASTING

The district's assistant superintendent for Business and Support Services, accounting coordinator and budget coordinator are responsible for managing the district's cash resources. WISD uses its budget to effectively manage resource needs during the course of the year. Monthly receipts of revenues from the state foundation school program, as well as reimbursements from federal and state sources for food services and grants provide liquidity to fund payroll and other operating expenditures.

On an annual basis, WISD budgets revenues and expenditures from all sources and for all purposes. Key factors impacting the estimates used to derive the amounts budgeted include:

- *Average annual attendance*—The district's daily student attendance for the most recent three years has averaged 94.58 percent, compared with the state average over the same period of 95.53 percent.
- *Energy costs*—Expenditures for energy, especially electricity and diesel fuel for the district's bus fleet, may vary significantly during the year and are outside of the district's control. However, actual expenditures for energy and fuel have remained fairly stable over the last three years. Utility and fuel expenditures increased by 14 percent and 15 percent, respectively from 2009 to 2010; however, overall expenditures did not exceed budgeted amounts in either year.
- *Maintenance*—Similar to energy costs, costs for repairs and maintenance of the district's schools and other facilities are outside of the district's direct control. Expenditures for physical plant maintenance and operations increased by approximately $700,000 in 2010, or 5 percent. However, overall maintenance expenditures did not exceed budget in the four years analyzed by the review team (2008–2011).

In addition to monitoring those factors discussed above, for the current fiscal year the district made allowances for certain contingencies that provide additional flexibility in forecasting cash flow needs. These contingencies are discussed below:

- *Superintendent allowance*—The district set aside $85,000 for the discretion of the superintendent. This amount may be used as deemed appropriate by the superintendent or made available to cover emergency or unforeseen expenses. All expenditures must follow normal district purchasing policies.
- *Maintenance allowance*—$300,000, or approximately 2 percent of the plant maintenance and operations budget, has been set aside to cover contingencies.
- *Assistant Superintendent for Business and Support Services*—An allowance of $30,000 is established for use at the assistant superintendent's discretion. Normal purchasing procedures apply.
- *Salary savings*—Approximately 1.25 percent of budgeted personnel expenses, or approximately $860,000, is estimated to be available during the year as a result of normal "salary savings." This type of savings results when budgeted positions are not filled during the year, or become vacant as a result of normal attrition. The assistant superintendent and budget coordinator monitor salary savings during the year to determine the amount available to meet cash flow short-falls or other contingent needs.

Establishing these contingencies totaling $1.275 million benefits the district by providing a cushion for unforeseen events without having to adjust the original budget or expend any portion of its accumulated fund balance. Other Texas districts rely on "salary savings" assumptions similar those used by WISD for budget management; however, the establishment of an actual allowance enhances transparency in the budget process.

RISK MANAGEMENT

WISD uses the insurance products typical of Texas school districts. The district's coordinator for Risk Management is responsible for consulting with external advisors, internal committees, and the board to determine the appropriate mix of insurance products to cover the district's employee health,

property and casualty risks. District risk management policies are published on the WISD website and are consistent for a school district of WISD's size and scope.

Insurance coverage and the annual premiums for the past three years are shown in **Exhibit 6–4**. The district incurred a significant loss under its property insurance policy in 2009 when a fire destroyed part of the A.J. Moore Academy. Approximately $1.7 million in damage claims were covered by its policy. Other than this loss, covered claims have been less than $100,000 for the past three years.

ACCOMPLISHMENT

- The district effectively manages workers' compensation claims.

FINDING

- WISD does not maintain an adequate inventory system.

RECOMMENDATION

- **Recommendation 26: Revise district policy for tagging and tracking small dollar items and annually perform physical inventories of all furniture, fixtures and equipment at each campus.**

DETAILED ACCOMPLISHMENT

WORKERS' COMPENSATION INSURANCE

The district effectively manages workers' compensation claims. WISD is self-insured for workers' compensation (WC) and unemployment through programs with the Texas Association of School Boards (TASB). The TASB Workers' Compensation fund was established to more effectively charge school districts for their share of WC and unemployment costs, and to ensure that members make full accruals of actuarial estimates of the future costs of incurred claims. As a result, WISD workers' compensation costs have decreased significantly in the past five years. While the overall costs did slightly increase from 2010 to 2011, the district has cut costs by $166,643 since 2007. Claims history for the past five years is shown in **Exhibit 6–5**.

EXHIBIT 6–4
WISD INSURANCE COVERAGE AND ANNUAL PREMIUMS
FISCAL YEARS 2009 TO 2011

INSURANCE COVERAGE	2009	2010	2011
Educators' Legal Liability	$49,062	$46,137	$46,760
Commercial General Liability	9,124	9,815	13,036
Excess Liability	22,719	22,083	21,968
Surplus Lines	466	0	0
Crime	7,867	7,849	7,814
Terrorism	0	5,000	0
Commercial Property	185,661	161,620	168,103
Commercial Inland Marine	5,824	24,719	28,173
Engineering	5,000	7,077	5,000
Equipment	0	5,824	6,935
Pollution	1,289	1,446	1,737
Asbestos	9,500	9,500	9,440
Auto Fleet Liability	29,575	31,200	26,462
Auto Physical Damage	5,089	5,731	7,126
Student Accident-Athletics	8,776	8,776	8,776
TOTAL	**$339,952**	**$346,777**	**$351,330**

SOURCE: WISD Coordinator for Risk Management, November 2011.

EXHIBIT 6–5
WORKERS' COMPENSATION CLAIMS HISTORY
FISCAL YEARS 2007 TO 2011

YEAR	CLAIMS	COMPENSATION	HEALTH BENEFITS	EXPENSES	TOTAL
2007	257	$123,867	$208,900	$21,402	**$354,169**
2008	236	$92,483	$270,651	$5,224	**$368,358**
2009	261	$63,152	$239,506	$12,002	**$314,660**
2010	233	$26,470	$158,893	$815	**$186,178**
2011	253	$7,508	$177,545	$2,474	**$187,527**

SOURCE: WISD Coordinator for Risk Management, November 2011.

DETAILED FINDING

INVENTORYING OF CAPITAL ASSETS AND OTHER EQUIPMENT (REC. 26)

WISD does not maintain an adequate inventory system. The district tags and tracks too many small-dollar equipment items for reasonable physical inventory and physical counts of equipment are not formally summarized and reconciled by the district's Business Office.

Section 5.4.7 of TEA's Financial Accountability System Resource Guide (FASRG) states that capital assets are "are physical items of equipment or property having an expected life longer than one year; are of a significant value at purchase; and may be reasonably identified and controlled through an inventory system." Examples of capital assets include land, buildings, furniture, computers and other equipment.School districts must maintain controls and accountability for these items. TEA policy also states that all capital assets of $5,000 or more must be tagged and verified annually.

Currently, the district maintains a capital asset module within its enterprise resource program (ERP) system called "FAMP" that facilitates the tracking of property, vehicles, buildings and equipment. Buildings and equipment purchases of $5,000 or more are capitalized and depreciated in accordance with regulations of the Texas Education Agency (TEA) and generally accepted accounting principles. WISD uses FAMP to record information about each inventory item, including original cost, description, school location, and bar code tag number. For capital assets, the system also tracks useful life and depreciation information. WISD's assistant superintendent for Business and Support Services is responsible for maintaining the assets in the district's accounting system and for conducting periodic physical counts of equipment on hand.

Section 5.4.7 of the TEA's FASRG states: "The purchase of capital assets entails additional procedures to record the item in the capital asset records and identify the asset as school property for security and tracking purposes." The implied intent of this requirement is that each capital asset should be tagged or otherwise identified as property of the district and its physical existence should be ascertained each year to ensure that the item still provides value to the district to justify its inclusion in the financial statements.

At the time of the review, WISD reported 1,100 capital assets with book value of approximately $10.4 million. **Exhibit 6–6** shows the totals by function of capital assets. However, beyond the high dollar items listed in **Exhibit 6–6**, WISD also maintains their own local policy that expands the TEA definition to include the tracking and tagging of all equipment over $500 and electronic components (e.g., computers) over $100. Each item is assigned a unique code number corresponding to the function, description (e.g., manufacturer, model and serial number), location (campus) and cost amount. This includes 28,000 computers or other electronic instruments such as personal digital devices.

For larger districts such as WISD, this decision to tag and track lower value items makes the inventory process more time-consuming and difficult on staff to maintain and monitor. Spending time each year to count up to 30,000 items of small individual value may not be the best use of staff time. Even when spread over 30 campuses, physically locating 1,000 items at each campus, as well as tracking missing items and aggregating the records and reconciling the reports represents a significant amount of time.

In addition to increasing the inefficiency of inventorying by tracking and tagging low dollar items, the district also does not ensure that physical inventory counts are being conducted. Currently, the district provides each campus with listings of assets assigned to the campus to facilitate the

EXIHIBIT 6–6
WISD CAPITAL ASSETS
2011–12

FUNCTION	TOTAL #ASSETS	# FULLY DEPRECIATED	ACTUAL COST	ACCUMULATED DEPRECIATION	BOOK VALUE
Instruction	85	50	$988,655	$621,995	$366,660
Instructional resources & media	2	2	$11,928	$11,928	$0
Curriculum and instruction	3	0	$16,996	$9,680	$7,316
Instructional leadership	1	1	$5,562	$5,562	$0
School leadership	7	7	$63,530	$63,530	$0
Transportation	83	0	$5,656,588	$2,012,467	$3,644,121
Food services	240	169	$1,993,400	$1,401,748	$591,652
Co- and extra-curricular	61	12	$848,544	$543,191	$305,353
General administration	43	19	$572,735	$494,342	$78,393
Plant maintenance	124	52	$1,722,622	$1,096,169	$626,453
Security and monitoring	24	10	$526,645	$317,614	$209,031
Data processing	291	142	$4,229,126	$3,200,089	$1,029,037
Community services	5	2	$73,679	$33,398	$40,281
Facilities acquisition and construction	131	0	$3,868,309	$265,271	$3,603,038
TOTAL	**1,100**	**466**	**$20,578,319**	**$10,076,984**	**$10,501,335**

SOURCE: WISD Business Office, 2011.

annual inventory. Also, items are tagged with a bar code that schools can scan with a hand-held scanning device that further simplifies the physical count process. However, the physical inventories at each school are not monitored and the results are not aggregated and reconciled by the Business Office.

During interviews and focus groups conducted during onsite work, the review team learned that some campuses conduct physical counts; however, the majority of schools conduct no inventory at all. The results of the counts that are conducted are not summarized by the district or reviewed to ensure that discrepancies are resolved. Furthermore, some schools count all inventory items, while others count only equipment that is checked-out (e.g., computers-on-wheels), and the timing for the physical count varies widely. Failure to adequately monitor district assets through annual physical counts can result in misstated financial statements and increased cost for replacement of lost or stolen equipment. Inaccurate records of equipment on hand could result in additional costs for insurance coverage or could hinder recovery for destroyed equipment in the event of school fire or flood. Inaccurate records also hinder the technology department's ability to assess the needs of schools for electronic equipment and to ensure that equipment is equitably allocated among all district campuses.

WISD reported an incident to its Board of Trustees in May 2011 in which computer equipment was sold by a former employee for personal gain without the knowledge of district administrators. Annual physical counts of such valuable equipment would reduce the risk of similar losses.

In order to improve the effectiveness and efficiency of their inventory system, WISD should revise district policy for tagging and tracking small dollar items and annually perform physical inventories of all furniture, fixtures and equipment at each campus. To accomplish this, the district should consider taking the following steps:

- Increase the current thresholds for tagging and tracking equipment items, and implement procedures to monitor the expenditures for equipment below

the new threshold. The TEA's FASRG designates object codes 6395–6398 for local use in tracking purchases of materials or supplies. All expenditures coded to these object codes "roll-up" to Object Code 6399 General Supplies in district Public Education Information Management System (PEIMS) reports. WISD currently uses separate codes for equipment above and below the threshold which allows the district to periodically scan expenditures to ensure that all equipment to be tracked has been tagged and to monitor expenditures below the threshold for reasonableness. Items such as laptop computers, digital cameras or other relatively small, highly mobile equipment items that have intrinsic value outside the school should continue to be tracked. However, the district may want to re-consider the dollar threshold of $100 in order to limit the number of tracked items to those that can reasonably be counted each year. It may not be necessary to tag certain items such as smart boards, projectors, desktop computers or other items which are permanently installed or that can be secured physically.

- Designate a district official, such as the coordinator for Accounting and Payroll, with the primary responsibility for overseeing the physical inventory of all assets that fall within the designated financial threshold. The responsibilities of other employees, such as school principals and departmental managers, for completing and reporting the results of counts of equipment assigned to them should also be explicitly stated in district policy.
- Ensure that each school or department is tracking the same equipment types and collecting the same information for its inventory (e.g., location, brand name, model/serial number, and description).
- Establish a period during the spring semester when all campuses and central administrative departments will conduct the physical inventories. Many school districts schedule inventories during March or April because there is less disruption of normal operations during these months and fewer new equipment purchases occur.
- Provide control lists of equipment for each campus to validate.
- Make scanners available for each campus. Currently, WISD makes scanners available for campuses to check out on loan. However, if each campus begins to effectively implement an inventory system, the district needs to determine if this current loan system needs to be modified to appropriately accommodate every campus or if new scanners need to be purchased or new loan scheduling system should be put into place.
- Designate one Business Office staff member to coordinate the physical count, aggregate the results, and reconcile the equipment inventories in FAMP.
- Make any necessary revisions in FAMP, such as disposals and changes in location, based on documentation received from each school or department.
- Review and approve the results of the annual physical inventory, including disposals resulting from loss, theft, damage or obsolescence. This should be done by the assistant superintendent for Business and Operations.
- Conduct periodic internal audits to ensure that the physical counts at each campus are conducted in accordance with district policies.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
26. Revise district policy for tagging and tracking small dollar items and annually perform physical inventories of all furniture, fixtures and equipment at each campus.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 6	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 7

FINANCIAL MANAGEMENT

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 7. FINANCIAL MANAGEMENT

Financial management encompasses those activities and processes for maximizing the effective use of the district's limited financial resources. Processes reviewed include budgeting, financial reporting, payroll administration, tax and other revenue collection, external and internal auditing, and procurement. Effective financial management relies heavily on the administrative information systems, also known as Enterprise Resource Planning (ERP) systems, to collect and manage financial and operational data. Financial reporting includes those financial reports provided to the district's Board of Trustees, as well as annual audited financial statements and data periodically submitted to the Texas Education Agency's (TEA) Public Education Information Management System (PEIMS).

School districts are public entities entrusted with federal, state and local funds to pursue their educational mission. Financial managers of school districts are charged with implementing the processes and procedures to manage such funds in accordance with law, regulation, or district policy. Districts use their staff, financial systems, external and internal auditors, tax appraisal and collection service, and other tools to ensure their constituencies that the district is effectively and efficiently managing its financial resources.

The TEA state administrative regulations in the Financial Accountability System Resource Guide (FASRG) help districts self-monitor and assist other organizations in providing external monitoring of districts. In addition, TEA monitors districts' financial management through analysis of district-submitted data via the PEIMS and reviews of annual external audits and other required reports.

As resources for education become increasingly limited, effective financial management is critical in ensuring that the school system objectives are met. Each year, TEA issues a rating of individual district's financial management in the Financial Integrity Rating System of Texas (FIRST). FIRST is one tool that TEA uses to present the financial health and viability of Texas school districts. The purpose of FIRST is to ensure that school districts are held accountable for the quality of their financial management practices and achieve improved performance in the management of their financial resources. The system also is designed to encourage school districts to provide maximum funding allocation to the Instruction function (Function 11) for direct instructional purposes.

Over the past five years, WISD has received the following FIRST ratings:

- 2011 Superior Achievement
- 2010 Superior Achievement
- 2009 Above Standard Achievement
- 2008 Superior Achievement
- 2007 Superior Achievement

Waco Independent School District (WISD) has received the highest possible FIRST score, Superior Achievement, over the past five years with the exception of the 2008–09 year. The district received a score one position below the highest level, Above Standard Achievement, for the 2008–09 year due to the district's academic rating in 2009 as Academically Unacceptable. This factor was eliminated from FIRST in 2011. All other financial indicators were positive.

Over the past five years of FIRST scores, there were only two factors for which WISD did not receive the highest possible score. The first measure relates to the requirement that districts spend at least 65 percent of total expenditures for direct instructional purposes. This rule was dropped from the FIRST scoring template after 2008. The second measure relates to the fact that WISD earned less than $20 per student on its investment portfolio in 2010, earning $6.82 per student.

The Comptroller's Financial Allocation Study for Texas (FAST) examines both academic progress and spending at Texas school districts. Based on a possible rating of one to five stars, the higher number of stars indicates the strongest relative progress combined with the lowest relative spending. For fiscal year 2009–10, WISD earned 2.5 stars – the district's spending was lower than its peer districts, but academic performance was much lower. Peer districts are districts similar to Waco ISD that are used for comparison purposes.

District staff levels indicate that the district has more staff relative to its student population than the state average. As shown in **Exhibit 7–1**, the district had an overall pupil-staff ratio of 7.17 to 1, which is less than the 7.41 to 1 state

EXHIBIT 7–1
WISD AND STATE AVERAGE PUPIL-STAFF RATIOS
2010–11

PUPIL-STAFF RATIOS	WISD	STATE
Staff Total	7.17	7.41
Professional Staff	11.08	11.68
Teachers	14.15	14.67
Professional Support	71.99	81.93
Campus Administrators	214.95	261.89
Central Administrators	952.50	720.28
Aides	86.10	78.00
Auxiliary	26.56	27.33

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

average. Lower pupil-staff ratios indicate a larger number of employees relative to the student population. If WISD operated at the state average ratio, it would have approximately 69 fewer employees.

As indicated in **Exhibit 7–1**, WISD has more total and professional staff than the state average due to higher numbers of teachers, professional support staff, campus administrators and auxiliary staff per student than the state average. This circumstance is due primarily to the large number of small schools in WISD. The district employs fewer aides and has fewer central administrators relative to the student population than the state average.

WISD's adopted budget for fiscal year 2012 was $112.7 million, of which $59.1 million, or 52 percent, was allocated for instruction. The budget planned for $109.8 million in revenue, resulting in a projected deficit of $2.9 million to be covered by the district's undesignated fund balance. The primary sources of revenue are the state foundation formula funding of $64.3 million (57 percent) and property taxes and other local source revenue of $41.5 million (37 percent). **Exhibit 7–2** provides summary information about WISD's general fund for the most recent five years.

During the budget process for the current year, many Texas school districts implemented measures to reduce expenditures in anticipation of decreased state support. Even with cuts in spending for school year 2011–12, WISD projects that operating expenditures will exceed revenues and thereby reduce the undesignated fund balance by $2.9 million. WISD's peers faced similar pressures to reduce spending, as two of the four peer districts used their fund balance to cover operating deficits. Revenue, expenditures, and changes in fund balances for WISD and its peers are shown in **Exhibit 7–3**.

Despite its deficit spending in 2011–12, WISD has made great strides to improve its financial stability over the past 16 years. During the mid-1990s WISD was in poor financial condition with a fund balance of just over $500,000 and less than $100,000 of that fund balance undesignated, or available to fund future financial obligations. At the end of fiscal year 1995, WISD's available fund balance represented less than one percent of the following year's budgeted expenditures.

Since then, WISD has increased its fund balance in all but two fiscal years, and the unrestricted portion of fund balance has risen to its current level of $27.4 million, or 24.3 percent of budgeted expenditures for fiscal year 2011–12. As noted in **Exhibit 7–4**, both total fund balance, as well as the undesignated portion thereof (i.e., funds available to meet future obligations), have increased each year. The percentage of future year's budgeted expenditures covered by available funds has also increased each year since 2007.

Since 2008, WISD's total expenditures have increased from $6,791 per-student to $7,222 per-student, an increase of 6.3

EXHIBIT 7–2
WISD GENERAL FUND SUMMARY ACTUAL REVENUES/EXPENDITURES
FISCAL YEARS 2008 TO 2011 AND ADOPTED BUDGET FOR FISCAL YEAR 2012

FISCAL YEAR	REVENUES	EXPENDITURES	OTHER SOURCES	CHANGE IN FUND BALANCE	ENDING FUND BALANCE
2008	$110,153,084	$108,865,343	$1,389,978	$2,677,719	$25,720,211
2009	$108,369,820	$108,007,230	$126,023	$488,613	$26,208,934
2010	$110,555,850	$109,844,975	$2,116,984	$2,827,859	$29,036,793
2011	$109,549,373	$110,101,919	$1,684,637	$1,132,091	$30,363,618
2012	$109,838,242	$112,742,711	$0	($2,904,469)	$27,129,489

SOURCE: Texas Education Agency website, WISD Adopted Budget 2011–12.

EXHIBIT 7–3
WISD AND PEER DISTRICTS
GENERAL FUND REVENUES, EXPENDITURES, AND CHANGE IN FUND BALANCE
FISCAL YEAR 2012

DISTRICT	TOTAL GENERAL FUND REVENUES	TOTAL GENERAL FUND EXPENDITURES	CHANGE IN FUND BALANCE
Waco ISD	**$109,838,242**	**$112,742,711**	**($2,904,469)**
Harlandale ISD	$119,371,840	$121,118,862	($1,747,022)
Bryan ISD	$106,058,644	$108,501,240	($2,442,596)
Tyler ISD	$129,907,603	$127,942,175	$1,965,428
Donna ISD	$141,877,162	$138,021,298	$3,855,864

SOURCE: 2012 Adopted budgets WISD, Harlandale ISD, Bryan ISD, Tyler ISD, and Donna ISD websites.

EXHIBIT 7–4
WISD BUDGET, EXPENDITURES, AND FUND BALANCES
FISCAL YEARS 2007 TO 2011

FISCAL YEAR	FINAL BUDGET	ACTUAL EXPENDITURES	EXPENDITURES AS A PERCENTAGE OF BUDGET	TOTAL FUND BALANCE (FB)	UNDESIGNATED FUND BALANCE	UNDESIGNATED FB AS A PERCENTAGE OF TOTAL FB	UNDESIGNATED FB AS A PERCENTAGE OF SUBSEQUENT YEARS' BUDGET
2007	$109,964,256	$103,946,893	94.5%	$23,042,492	$20,693,381	89.8%	18.6%
2008	$111,357,795	$108,865,343	97.8%	$25,720,211	$23,869,841	92.8%	21.4%
2009	$111,357,797	$108,007,230	97.0%	$26,208,934	$24,886,922	95.0%	22.0%
2010	$112,968,666	$109,844,975	97.2%	$29,036,793	$27,072,569	93.2%	23.4%
2011	$116,083,206	$110,101,919	94.8%	$30,363,618	$27,424,965	90.3%	24.3%

SOURCE: WISD Adopted Budget 2011–12.

percent over three years, or an average annual rate of just above 2 percent. **Exhibit 7–5** shows WISD's total expenditures (per-student) for the period from 2008 through 2011 compared with its peers and the state-wide average. Only one peer district, Donna ISD, reported a net decrease in per-student expenditures for the period.

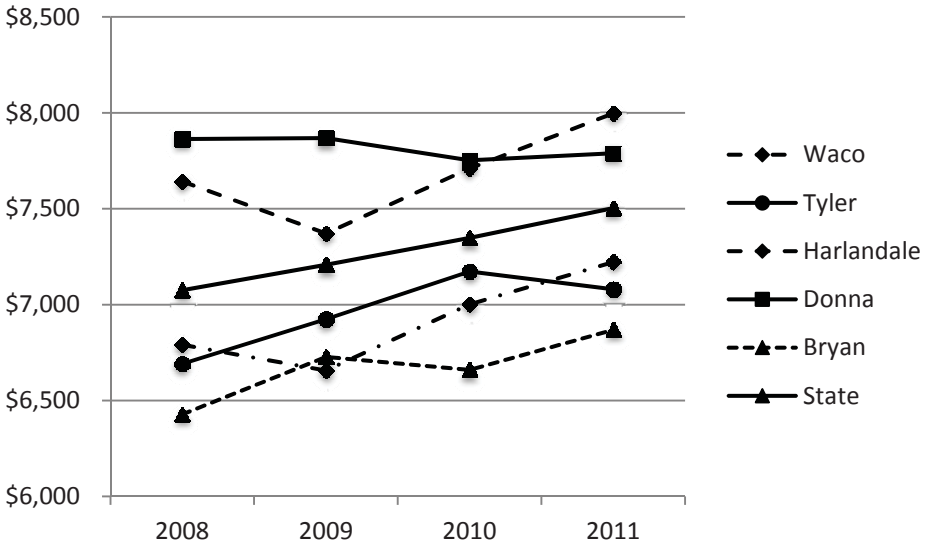
During the same period, WISD instructional spending per student (Functions 11 and 36) increased from $4,057 to $4,328, or 6.7 percent. Despite this increase in instruction-related spending, WISD continues to trail its peers, as well as the state-wide average, in this measure of funds allocation. **Exhibit 7–6** compares WISD's instructional spending per student to its peer districts.

Financial management within WISD is under the direction of the assistant superintendent for Business and Support Services (assistant superintendent). The assistant superintendent joined WISD in 2004 and at one time oversaw virtually all non-academic functions: finance, purchasing, warehouse, facilities, transportation, food services, information technology, human resources, and safety and security.

As a result of a number of organizational changes since 2006, the assistant superintendent now oversees finance (including purchasing and warehouse operations), facilities, and food services. The management of food services is now outsourced to a third party contractor. The current scope of responsibilities allows the assistant superintendent to devote additional and necessary attention to financial management of the district. The current organization for financial management is shown in **Exhibit 7–7**.

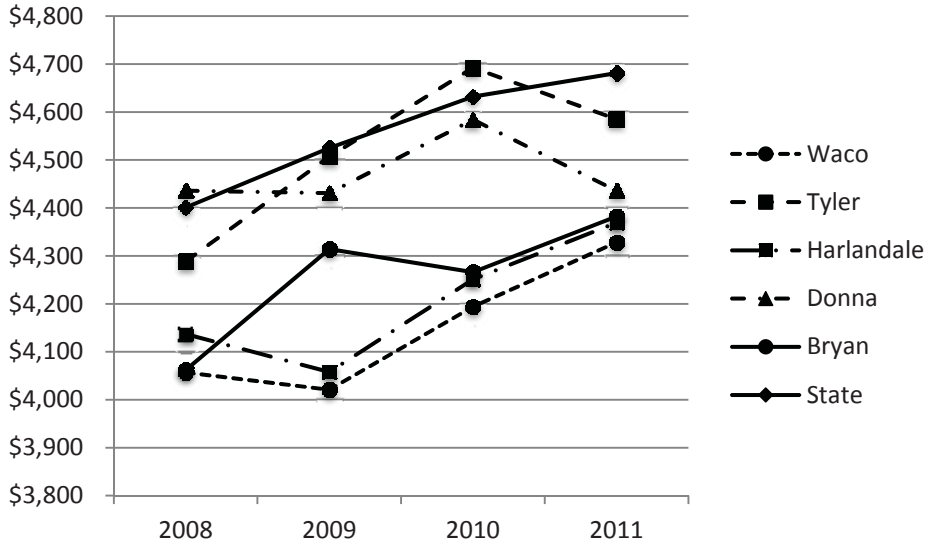
The assistant superintendent has primary responsibility for coordination with the district's external auditor to ensure timely audits of the district's financial statements each year. Audited financial statements must be submitted to TEA by January for the preceding fiscal year. External audits are also a key component of effective district financial management. For the past four years, WISD has received unqualified, or "clean" opinions on its financial statements and no weaknesses

EXHIBIT 7–5
WISD AND PEER DISTRICTS
TREND ANALYSIS OF TOTAL PER-STUDENT SPENDING
FISCAL YEARS 2008 TO 2011



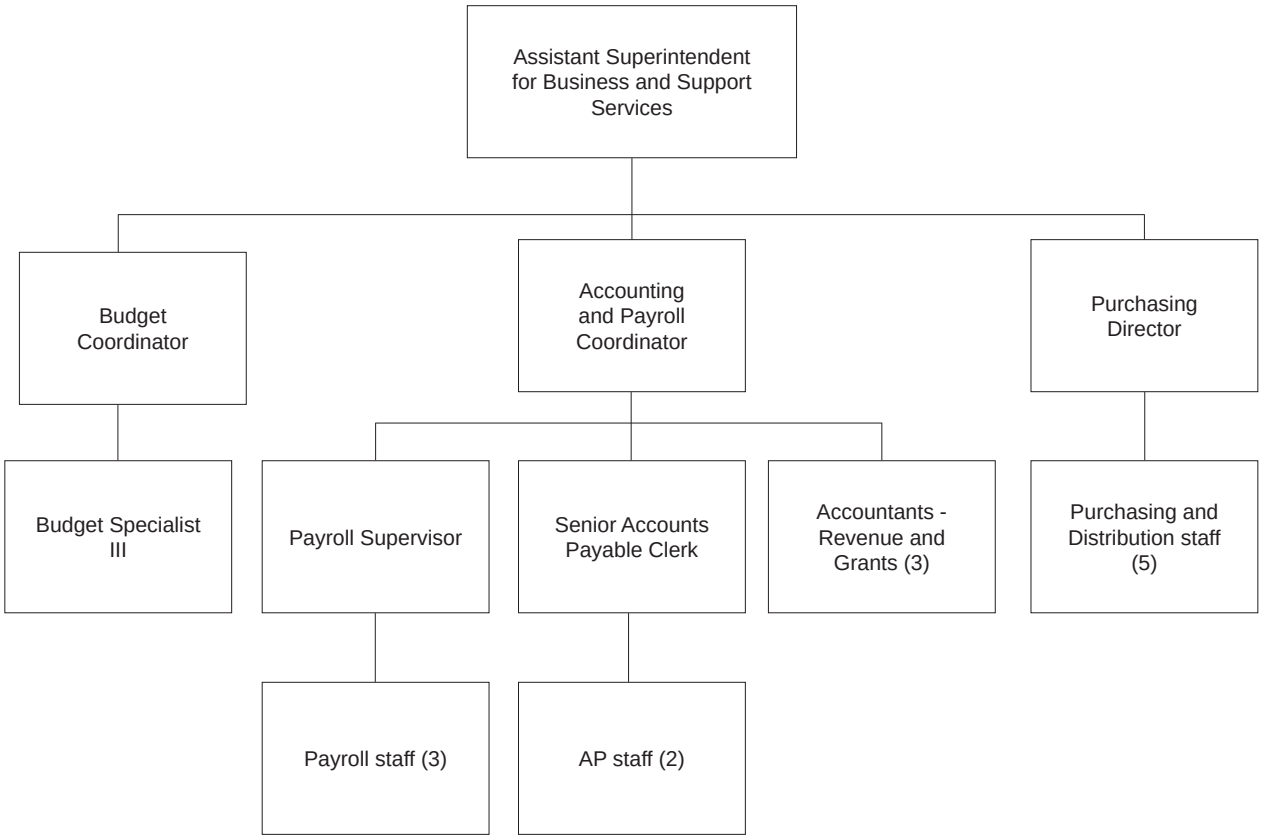
SOURCE: Texas Education Agency, Financial Reports.

EXHIBIT 7–6
WISD AND PEER DISTRICTS
TREND ANALYSIS OF INSTRUCTIONAL SPENDING PER-STUDENT
FISCAL YEARS 2008 TO 2011



SOURCE: Texas Education Agency, Financial Reports.

EXHIBIT 7–7
WISD FINANCIAL MANAGEMENT ORGANIZATION



SOURCE: Interviews of WISD Business Office staff, November 2012.

in internal controls were noted by the district's external auditors.

WISD has experienced significant turnover in business and accounting functions recently. Three of the six employees reporting to the accounting and budget coordinators have less than one year of experience with the district. The other three have been at their current positions less than one year. Based on interviews, the departure of former members of the Business Office staff is not related to any issue or problem with the district's financial condition or the management of the Business Office functions.

FINDINGS

- WISD's budget process does not incorporate performance or efficiency measurement, limiting the ability to demonstrate to the board and to district stakeholders that it is using its financial resources effectively.
- WISD underutilizes its financial, payroll and human resources information systems, resulting in extensive manual procedures and reconciliations to perform basic budgeting and accounting functions.
- Internal control weaknesses exist in the payroll processes resulting in inefficient processes and risk of material misstatements.

RECOMMENDATIONS

- **Recommendation 27: Improve the district's ability to demonstrate the efficiency and effectiveness of its spending by incorporating performance-based budgeting.**
- **Recommendation 28: Integrate and automate the information systems for human resources, payroll, budgeting and finance to improve the reliability of data and reduce the time spent by district**

staff processing transactions and handling paper documentation.

- **Recommendation 29: Address payroll internal control weaknesses and inefficiencies.**

DETAILED FINDINGS

IMPLEMENT PERFORMANCE-BASED BUDGETING (REC. 27)

WISD's budget process does not incorporate performance or efficiency measurement, limiting the ability to demonstrate to the board and to district stakeholders that it is using its financial resources effectively. Each year, Texas school districts are required to create a budget that must be adopted by its school board. Most school systems, including WISD, develop a budget based on a "last year—this year—next year" approach, which looks at the prior and current years as a base to be increased or decreased in the next year. An example of this approach is WISD's primary budget schedule for fiscal year 2012 (**Exhibit 7–8**).

WISD presents budgetary data at the functional code level, but also shows comparative data (actual and budgeted) at the object code and school level. This level of detail improves the information provided to its constituents, but is lacking in some areas, such as: (1) being transparent as to the justification for all expenditures, (2) allocating resources equitably based on measures of performance and efficiently, and (3) supporting the allocation of resources to WISD priorities established in the strategic plan.

The budget approach used by WISD is insufficient for several reasons:

- Three years of data is not sufficient to understand trends in district financial performance;
- Viewing total dollar amounts at the function code or object code level is not particularly informative as there is no contextual reference such as measures of efficiency or efficacy;
- It is more difficult to demonstrate the relationship between the district's budget and district priorities when utilizing a traditional budget model;
- The current approach focuses primarily on the incremental increases or decreases from the prior year budget, and does not give a sense of the adequacy or efficiency of the core budget;
- While meeting regulatory requirements, WISD's model does not provide the board members or the community with sufficient information to assess the performance of the school district and its stewardship of financial resources; and
- It is not linked to the District Improvement Plan or the Campus Improvement Plan.

A performance-based budget seeks to justify spending levels by measuring the efficiency of resources employed by the organization. The performance model is considered supplemental to the required line-item approach because it provides more useful information for the evaluation of administrators, focuses on outcomes and accomplishments, and details the use of resources at the individual program or department level. By implementing performance measures and showing a five-year trend of performance for each program, department, school or area, readers of the district's budget can gain a better sense of the efficiency of district programs and operations.

By linking efficiency analysis directly to the budget process, school district management is able to ensure that resources throughout the school system are allocated to support efficient operations. Performance-based budgeting also provides board members and other stakeholders with the information they need to fully understand the implications of the district budget.

One district which implemented performance-based budgeting, Grand Prairie Independent School District, identified efficiency and qualitative performance measures for all non-instructional functions, as well as developed data tools to enhance the analysis and reporting of performance measures. The district used a portion of cost savings identified through the process to underwrite the additional investments in improved efficiency.

A second district, Tyler Independent School District, developed a performance measurement system that addresses many operational areas, including academic program management, facilities management, food services, transportation, financial management, human resources management, information technology services, and global performance goals. The district's primary objective was to develop an internal performance monitoring program—including data definition, collection, and analysis—that enables the district to continuously improve operations and to integrate effectively the strategic planning and annual budgeting processes.

EXHIBIT 7–8
WISD GENERAL FUND THREE-YEAR COMPARISON
FISCAL YEAR 2012

	2009–10 AUDITED ACTUAL	2010–11 AMENDED BUDGET	2011–12 PROPOSED BUDGET
Revenues:			
Local and Intermediate Source Revenue	$41,225,238	$41,223,282	$41,514,994
State Program Revenue	67,018,895	66,317,037	64,297,913
Federal Program Revenue	2,311,717	3,773,701	4,025,335
Total Revenues	**$110,555,850**	**$111,314,020**	**$109,838,242**
Appropriations:			
Instruction	55,837,880	$57,577,175	$ 59,078,787
Instructional Resources and Media Services	1,124,203	1,114,340	1,068,363
Instructional Staff Development and Curriculum Development	1,109,784	1,228,834	2,592,599
Instructional Leadership	2,033,389	2,237,017	2,501,024
School Leadership	8,156,758	8,502,143	8,452,363
Guidance, Counseling and Evaluation Services	3,465,764	3,491,303	3,025,324
Social Work Services	812,500	759,422	744,599
Health Services	1,157,203	1,152,027	1,100,322
Student Transportation	2,600,676	3,409,581	2,636,332
Food Services			
Extracurricular Activities	3,395,712	3,656,287	3,432,023
General Administration	3,130,058	3,651,333	3,510,063
Plant Maintenance Operations	14,683,257	15,981,623	15,193,744
Security and Monitoring Services	1,809,588	2,059,178	1,794,020
Data Processing Services	3,340,374	4,312,344	2,361,815
Community Services	1,205,129	1,187,889	658,387
Debt Service	1,113,015	972,913	971,326
Facilities Acquisition and Construction	1,337,467	757,616	
Payments to Shared Services Arrangement	208,000	193,000	200,000
Payments to Juvenile Justice Alternative Education Program	677,568	698,001	542,732
Payments to Tax Increment Fund	2,006,362	2,500,880	2,268,678
Other Intergovernmental Charges	640,288	640,300	610,210
Total Appropriations	**$109,844,975**	**$116,083,205**	**$112,742,711**
Excess (Deficiency) of Estimated Revenues Over Appropriations	**$710,875**	**($4,769,184)**	**($2,904,469)**
Other Financing Sources/(Uses)	**2,116,984**	**1,645,000**	
Net Change in Fund Balance	**$2,827,859**	**($3,124,184)**	**($2,904,469)**
Fund Balance, beginning of year	**26,208,934**	**29,036,793**	**30,033,958**
Fund Balance, end of year	**$29,036,793**	**$25,912,609**	**$27,129,489**

EXHIBIT 7–8 (CONTINUED)
WISD GENERAL FUND THREE-YEAR COMPARISON
FISCAL YEAR 2012

	2009–10 AUDITED ACTUAL	2010–11 AMENDED BUDGET	2011–12 PROPOSED BUDGET
Non-spendable Funds:			
Inventories	250,620	(250,000)	250,620
Restricted Funds:			
Retirement of Long-term Debt			
National School Lunch and Breakfast Program			
Committed Funds:			
Construction		1,432,977	1,261,547
Capital Expenditures for Equipment	537,650	635,326	485,938
Assigned Funds:			
Construction	162,415	1,175,965	98,438
Encumbrances	1,013,539		200,000
Unreserved and Undesignated Fund Balance	**$ 27,072,569**	**$ 22,918,341**	**$ 24,832,946**

SOURCE: WISD Official Budget Schedules for Fiscal Year 2012.

A sample of performance measures relating to facilities management functions is presented in **Exhibit 7–9**. A district can select from this list those measures (or create new measures) which management believes are the most important in evaluating efficiency and performance. Performance measures can then be developed for all school district programs and departments.

WISD should improve its ability to demonstrate the efficiency and effectiveness of its spending by incorporating performance-based budgeting. The following elements should be implemented:

- Develop/update five-year performance measures by August 31st of each year;
- Begin departmental performance assessment on September 1st of each year, conducting trend, peer, and benchmark analyses;
- Identify cost reductions and service improvement opportunities through performance analysis by November 1st of each year;
- For each department/cost center, disclose in the budget document the top 10 performance measures that provide the most transparency into departmental spending; and
- Modify budget formulas to reflect results of efficiency analyses.

Implementation of performance-based budgeting will require effort on the part of Business Office staff, as well as district staff having budget development responsibilities. Outside assistance may also be required to help select and define the measures; define underlying data elements; evaluate data sources and data integrity; design and develop a performance measures model; and evaluate variances in measures. Based on similar projects conducted by Tyler ISD and Grand Prairie ISD, the one-time consultant cost is expected to be $125,000. Another alternative the district could consider would be to send staff to training in performance-based budgeting. The assistant superintendent for Business and Support Services, along with the Budget Coordinator should oversee the process. Through enhanced reporting of efficiency measures, the district will likely see a substantial return on this investment as new savings opportunities are identified.

INTEGRATION AND AUTOMATION OF HUMAN RESOURCES, BUDGET, PAYROLL, AND FINANCE SYSTEMS (REC. 28)

WISD underutilizes its financial, payroll and human resources information systems, resulting in extensive manual procedures and reconciliations to perform basic budgeting and accounting functions. The district uses multiple systems

EXHIBIT 7–9
SAMPLE PERFORMANCE MEASURES

PERFORMANCE MEASURES	LEVEL OF DETAIL
Staffing-related measures	
Gross square feet per total maintenance FTE	District
Gross square feet per total custodial FTE	Site
Acres per total groundskeeper FTE	District
Expenditure-related measures	
Custodial expenditures per gross square feet (including portables)	District
Grounds expenditures per acre	District
Maintenance expenditures per gross square feet (including portables)	District
Utility usage and cost-related measures	
Electricity cost per square foot	District
Kilowatts usage (electric) per square foot	District
Water cost per square foot	District
Water usage per square foot	District
Natural gas cost per square foot	District
Occupancy and building-related measures	
Gross square feet per student	School
Percentage of square footage that is portable	School
Maintenance Department service level-related measures	
Percentage of maintenance work orders that are completed each year	District
Percentage of "wrench time" for the maintenance department	District
Percentage of maintenance work orders that are compliant with Service Level Agreement priority level (1-4) response times	District
Percentage of maintenance work orders that are preventative	District
Average completion time of maintenance work orders, by priority	District
Average response time for maintenance work orders, by priority	District
Top and bottom 20 schools in terms of maintenance costs due to vandalism (labor and materials)	School
Top and bottom 20 schools in terms of total maintenance costs per student	School
Top and bottom 20 schools in terms of total maintenance cost per square foot	School
Input-related measures	
Total maintenance FTE trend	District
Total custodial FTE trend	District
Total grounds FTE trend	District
Total District gross square feet trend	District
Total enrollment trend	District
Customer satisfaction-related measures	
Customer satisfaction mean value for the maintenance department (three categories: quality of work, service provided, attitude)	District

SOURCE: Review Team, February 2012.

to capture and process data related to these functions. While each of these departments has a different mission, there is significant overlap in the data used by each department in carrying out that mission. For example, each of these groups needs complete and accurate data for every current employee including location, position, pay level, budget code and other information.

Many school districts utilize packaged enterprise resource planning (ERP) systems that include separate modules for human resources, payroll, budget and other financial functions. One of the advances of an ERP system is that it ensures that the data accessed by the separate modules are current and reliable. When each of these functions relies on its own information system, additional resources must be expended to ensure that new data is entered into each system completely and accurately, and that existing data is maintained across all systems correctly and in sync.

WISD departments use the following information systems:

- Human Resources – Human resources (HR) maintains a home-grown database (in FileMakerPro) that tracks information relevant to HR. Notifications of new hires and changes in information for existing employees are sent via paper personnel actions sheets, that are generated from FileMakerPro, to the budget and payroll departments. The HR database tracks vacant positions, but it does not include information regarding funding sources. Although the district has paid for the position management module in eFinancePlus, which tracks all positions whether filled or vacant, this module is not currently used.

- HR also maintains employee records in eFinancePlus, a proprietary system of SunGard. The version of the system currently installed is not being supported by the vendor, and WISD plans to upgrade to a web-based version of this system in the next fiscal year.

- Budgeting – The budget office uses a tool in eFinancePlus which allows them to extract a "snapshot" of current employee information with which to plan for future year's budget. The extract used does not include vacant positions; therefore, placeholder positions are entered to provide an estimate of resource needs if all positions were filled.

- Payroll – The payroll department utilizes three primary information systems. Actual semi-monthly payrolls are processed using a module of eFinancePlus. Payroll also uses a timekeeping system called Time Clock Plus (TCP) which allows employees to clock in and out at time clocks located at each school and other district facilities. A third system is the Substitute Employee Management System (SEMS) which automates the process for handling teacher absences and substitutions. The SEMS system maintains pay information for substitute teachers.

The various systems used by each of these departments are not integrated. Examples include the following:

- Transactions for new employees are entered initially into the FileMakerPro database in HR. Separate paper transactions sheets are printed, routed, signed, dated, and sent to the budget department in order to update the budget tool. Additionally, HR must make corresponding entries in eFinancePlus because this system does not interface with FileMakerPro.

- TCP is capable of providing data that can be uploaded directly to the eFinancePlus system for payroll processing, thereby avoiding duplicative manual data entry. Since TCP was purchased in 2008, a number of technical issues have arisen delaying the full automation of this process. The issues included incompatible versions of TCP and eFinancePlus software, problematic server configuration, and missing budget/account codes. To date, output of the TCP system is used for review purposes only. Time sheets from TCP are checked—employee by employee—with the standard time recorded in eFinancePlus.

- TCP time sheets for every employee are printed and signed by the employee and the employee's supervisor (principal or department manager) before being forwarded to payroll specialists. Time sheets are alphabetically sorted and payroll specialists review each time sheet to determine whether actual time worked differs from the standard work week as coded in eFinancePlus. For any differences, adjustments are made manually in the eFinancePlus payroll system so that actual pay is correct and leave balances are adjusted.

The lack of integration and automation of these systems results in inefficient, manual data entry; increased probability of errors and/or incomplete data; additional staff time to print paper transactions or time sheets; additional effort spent keeping multiple information systems in sync; and a

higher volume of paper documents routed through inter-office mail and subject to filing, storage, and records retention.

WISD also utilizes the eFinancePlus system in procurement and accounts payable to process purchase requisitions, issue purchase orders, and authorize payments. The system uses electronic routing of documents to efficiently route purchase requisitions for review and approval.

Requisitions are created online at the school or department and routed electronically to the principal or department manager for approval. Approved requisitions route electronically to the Central Business Office Purchasing Department for review, approval, and creation of the purchase order (PO).

Currently, hard copies of POs are printed and sent to each school or department for use as a receiving report. When goods or services are received by the school, the PO copy is signed and dated by the employee receiving the goods and then returned to the Business Office accounts payable group to authorize the payment of the related invoice.

The eFinancePLUS system can support paperless receiving. This capability means that schools can indicate their receipt of goods and services online, rather than by using a paper copy of the PO. Electronic receiving works more efficiently by reducing the delay in returning the paper document to the Business Office. This method also reduces the volume of inter-office mail, as well as the time spent copying and filing the paper receiving reports.

WISD should integrate and automate the information systems for human resources, payroll, budgeting and finance to improve the reliability of data and reduce the time spent by district staff processing transactions and handling paper documentation. The following implementation strategies are recommended:

- Move forward with the upgrade to the web-based version of eFinancePlus as currently planned in fiscal year 2012–13;
- Discontinue the use of the FileMakerPro database system and move all HR functions to eFinancePlus;
- Implement the position management module in eFinancePlus and utilize this module for budget planning purposes;
- Implement the web-based features of TCP to eliminate the manual printing, routing and approval of paper time sheets and allow employees to review their timesheets online and supervisors to approve them without having to print and route paper timesheets;
- Implement the receiving function in eFinancePlus to eliminate the use of paper POs as receiving reports; and
- Revise training programs to ensure that school and department administrative staff understand the importance of recording receipt of all goods and services in eFinancePlus, rather than with paper receiving documents.

For the implementation of this recommendation, WISD will likely require external support of an information technology consulting firm. The district has already budgeted funds for the upgrade of its existing financial system to the web-based version. However, automating the payroll process (i.e., fully interfacing TCP and SEMS with the web-based version of eFinancePLUS) and implementing additional modules of eFinancePLUS may require additional cost for programming support. The estimated cost for this support in the next two fiscal years is $75,000 each year, which represents approximately 375 hours of external consulting service over the next two fiscal years. This investment should be recovered by increased productivity of WISD Business Office staff in higher valued activities.

ADDRESS PAYROLL CONTROL WEAKNESSES (REC. 29)

Internal control weaknesses exist in the payroll processes resulting in inefficient processes and risk of material misstatements. These weaknesses were evident in recurring errors in substitute teacher payrolls and the absence of payroll reasonableness reviews. Each of these weaknesses is discussed in further detail below.

SUBSTITUTE TEACHER PAYROLL

During interviews with senior payroll staff, the review team discussed ongoing errors in the Substitute Employee Management System (SEMS) which causes delays and additional review time by payroll specialists. The SEMS handles the process by which teachers notify the district of a pending or emergency absence and a substitute teacher is called to fill the absence.

The SEMS completely automates the administrative function of arranging for substitute teachers, as well as the tracking leave time for teachers and payroll records for substitutes.

Each pay period, a clerk downloads the data about leave taken by WISD teachers and the days worked by each substitute. This data can be uploaded automatically to eFinancePLUS (using a text file from the SEMS system), rather than requiring payroll specialists to enter all the data manually.

Two types of errors are occurring in the transfer of data from SEMS to eFinancePLUS. The first error involves the payment of substitutes for a full day when only a half-day is worked. The second error occurs when a substitute teacher is also a regular employee of the district. This situation can occur when the person has been a substitute and is subsequently employed as a regular teacher. The system cannot distinguish which pay record (regular teacher or substitute) to apply for calculation of pay, and errors of significant amounts result. These errors require payroll specialists to expend additional time to review each substitute pay amount manually and compare the pay calculation to supporting data from SEMS.

PAYROLL REASONABLENESS REVIEWS

During the semi-monthly processing, WISD payroll specialists perform numerous checks of data downloaded from the TCP system against time recorded in the eFinancePLUS payroll module. During the payroll calculation process, preliminary, final edit, and summary reports are generated by the system which specialists review to ensure that payroll processing is accurate and complete. However, no reviews are performed of total payroll amounts to ensure that all employee groups have been included or that any systemic errors in payroll calculation have been corrected.

Payroll expenditures account for a significant portion of a school district's total operating expenditures. On a statewide basis, payroll represents more than 81 percent of total general fund expenditures; for WISD, payroll accounts for approximately 78 percent of disbursements. Therefore, systemic errors in processing payrolls can result in significant financial losses to the district or material misstatements of financial reports.

One key control of payroll processing involves the comparison or reconciliation of the current payroll totals, including the number of employees and gross payroll amount, to the previous semi-monthly payroll totals. The eFinancePlus system includes standardized reports that compare employee counts, gross pay, and deductions in the current processing run with those from the most recent payroll; however, these reports were not reviewed prior to finalizing each payroll. The review and approval of these diagnostic reports by appropriate supervisory staff should be made a standard procedure of the payroll process.

WISD should address payroll internal control weaknesses and inefficiencies. Resolving the problems with the district's SunGard (the vendor for eFinancePLUS) representative would streamline the payroll process and free payroll specialists for more important activities.

No incremental expenditures or cost savings are projected by implementing this recommendation. However, the improvements in substitute teacher payroll and overall internal controls over the payroll process itself will provide benefits to the district in improved productivity of current staff and lower risk of financial errors related to payroll.

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	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
27. Improve the district's ability to demonstrate the efficiency and effectiveness of its spending by incorporating performance-based budgeting.	$0	$0	$0	$0	$0	$0	($125,000)
28. Integrate and automate the information systems for human resources, payroll, budgeting and finance to improve the reliability of data and reduce the time spent by district staff processing transactions and handling paper documentation.	$0	($75,000)	($75,000)	$0	$0	($150,000)	$0
29. Address payroll internal control weaknesses and inefficiencies.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 7	**$0**	**($75,000)**	**($75,000)**	**$0**	**$0**	**($150,000)**	**($125,000)**

CHAPTER 8

PURCHASING

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 8. PURCHASING

School districts in Texas must abide by federal and state laws, rules, and procedures regarding purchasing. Districts must abide by provisions in Chapter 44 of the Texas Education Code (TEC) and may participate in purchasing cooperatives as outlined in the Texas Government Code. The Texas Education Agency (TEA) provides a purchasing module in the Financial Accountability System Resource Guide (FASRG) to assist districts in self-monitoring for compliance with the various requirements. Adhering to requirements imposed by outside agencies is a necessary beginning step to ensure that a school district is effective and efficient in its purchasing activities. In addition to ensuring that it uses competitive and legal processes to obtain goods and services, a school district must ensure that it is meeting district needs, and students and employees are receiving the intended benefits.

The Waco Independent School District's (WISD) purchasing operations fall under the supervision of the director of Purchasing, who is assisted by a buyer and two purchasing specialists.

The district maintains a central warehouse, the oversight of which is also provided by the director of Purchasing. Located at 2025 South 19th Street, the facility is almost 13,000 square feet in capacity and is staffed by a warehouse supervisor, a foreman, three warehouse staff, and a warehouse specialist. **Exhibit 8–1** shows the organizational structure of both the Purchasing and Warehouse functions.

Exhibit 8–2 shows the Purchasing Department's budget for the past five years. Between 2007–08 and 2011–12, the department's budget increased by an average of 4 percent annually. For the 2011–12 budget, however, the departmental budget decreased by almost 6.5 percent.

The district's warehouse stocks a supply of construction/maintenance items as well as janitorial items, light bulbs, batteries, sports equipment, and bulk paper. The total value of inventory as of August 31, 2011 was $110,826.

Textbooks that have not been issued to classrooms are also stored in the warehouse and the warehouse specialist is responsible for the custody of textbooks. TEA allows school districts to obtain textbooks for their total enrollment plus a 3 percent reserve in order to provide books for new students or to replace lost books. Most books are stored at school sites when not in use, but reserve books or high school-level books that are not used during a semester are stored in the warehouse.

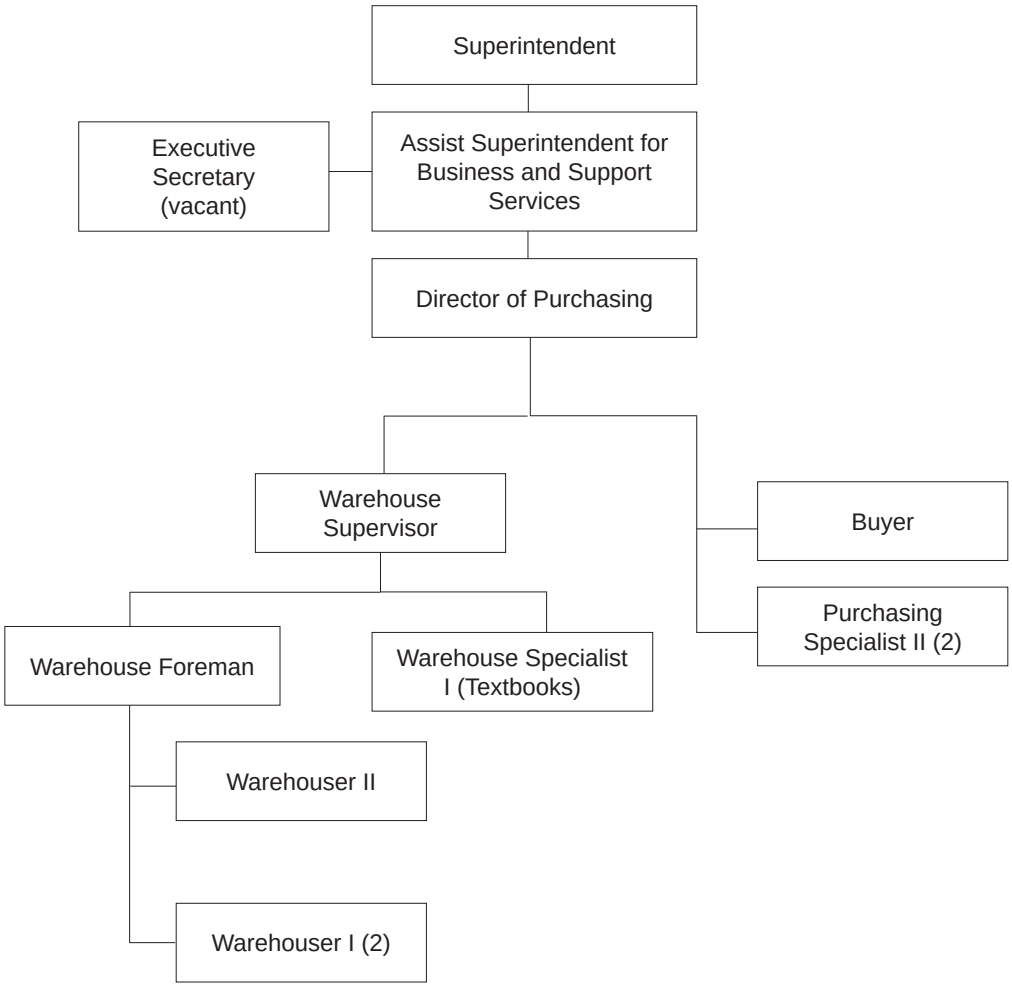
The warehouse specialist monitors textbook inventory and tracks lost or missing textbooks using an automated textbook inventory system that uses scannable bar code tags to identify and track each book. The specialist requires that all schools conduct an inventory of their textbooks each December. The specialist then conducts an independent count during summer months to verify the school's count. If books are missing, the specialist issues a preliminary report to each school's principal. All schools are allowed time to locate the missing books; if they cannot be found, the specialist prepares and sends an invoice to the responsible campus. Physical textbooks may soon become obsolete. Beginning in 2010–11, the Texas Legislature made it possible for districts to use their textbook allotment funds to purchase any type of textbook, including electronic books, software programs, and online applications. WISD is researching these alternative textbook options.

Most fixed asset equipment (furniture, computers, and other equipment) is delivered directly to the warehouse where it is tagged and recorded into the district's fixed asset system. Warehouse staff then delivers the items to the appropriate department or school.

The district's procurement method is primarily decentralized for items that can be purchased with a purchase order. Departmental or campus staff holding the procurement responsibility enters requisitions into the automated procurement system, eFinancePLUS, where requisitions are electronically routed to the appropriate supervisor(s) for approval. Once electronic approval is made, the requisition is reviewed by purchasing staff who issue a purchase order. Purchasing staff is responsible for sending purchase orders to vendors.

District employees are also able to view an online catalog of items stocked in the warehouse and place orders that are filled by warehouse staff. The warehouse maintains a regular delivery route that ensures each district location receives items on a weekly basis; however, items needed sooner than the weekly delivery schedule can either be picked up from

EXHIBIT 8–1
WISD ORGANIZATION OF PURCHASING AND WAREHOUSE FUNCTIONS



SOURCE: WISD Organizational Charts, October 2011.

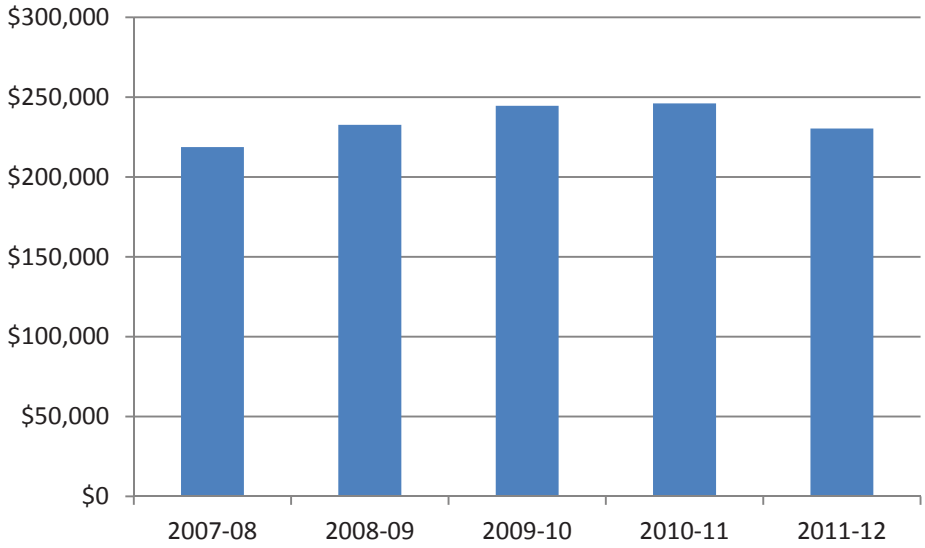
the warehouse, or warehouse employees make "hot shot" deliveries if time permits.

WISD uses procurement cards (p-cards) to make small purchases and to handle travel arrangements. The training, issuance, and oversight of p-cards is handled by the Finance Department. Using p-cards can help a district eliminate the need to process multiple purchase orders for small-dollar items, and allows employees to make purchases in a timely and efficient way.

In addition, the district contracted with Texas Fleet Fuel in December 2011 for gasoline cards used for all district fuel purchases. The cards are issued to the Transportation Department staff. The cards provide an inventory and security feature by capturing fuel purchases by card user and reporting on the date, amount of fuel purchased, user name for purchase, and vehicle mileage. This information along with the reports that can be generated assist the district in monitoring fuel use and identifying any unauthorized purchases or irregularities in this area.

WISD's Purchasing Department maintains a user's manual that is updated annually. Available to district staff in an electronic format, the manual provides detailed instructions on school purchasing laws, the district's electronic bidding system, purchase order processing, and warehouse requisitions. The manual also provides users with information on purchasing ethics, vendor selection, and federal tax reporting requirements.

EXHIBIT 8–2
WISD PURCHASING DEPARTMENT'S BUDGET
2007–08 TO 2011–12



SOURCE: WISD Budget Documents, 2007–08 to 2011–12.

ACCOMPLISHMENTS

- WISD uses an automated bidding system that allows vendors to be notified of bidding opportunities as well as to submit bids in an electronic fashion, saving the district both money and labor.
- WISD uses a just-in-time ordering and delivery process for the purchase of common office supplies.
- WISD's Purchasing Department maintains several agreements with purchasing cooperatives that help to save the district money while alleviating the burden of procuring bids for certain items.

FINDINGS

- WISD continues to use some manual processes, resulting in inefficiencies in the purchasing process that leaves the district at risk of potential errors.
- WISD does not have adequate oversight of contract monitoring from district personnel for some of its contracts.

RECOMMENDATIONS

- **Recommendation 30: Implement electronic receiving functions as well as electronic distribution of approved purchase orders and automated purchase orders for warehouse supplies to ensure that the district's purchasing processes are obtaining maximum efficiencies.**
- **Recommendation 31: Fully develop and implement contract oversight procedures to ensure that all of the district's contracts are adequately monitored and negotiated, and that contracts are audited on a regular basis, with audit results reported to the Board of Trustees.**

DETAILED ACCOMPLISHMENTS

ONLINE BIDDING SYSTEM

WISD uses an automated bidding system that allows vendors to be notified of bidding opportunities as well as to submit bids in an electronic fashion, saving the district both money and labor.

The district has contracted with a vendor, IonWave, since 2008 for an automated bidding system. The electronic bidding system allows vendors to place themselves in various categories for which they would like an opportunity to do business with the district. When a need exists for a product or service, companies registered in the system will automatically be emailed a bid invitation.

This electronic procurement application, shown in **Exhibit 8–3**, has automated the time-consuming process of identifying vendors who should receive bid solicitations and mailing bidding invitations. Use of the system also has streamlined vendor communications, as bid documents are now available to vendors from the district's website.

EXHIBIT 8–3
WISD AUTOMATED BIDDING SYSTEM

AVAILABLE BID OPPORTUNITIES

BID NUMBER	BID TYPE	BID TITLE	BID ISSUE DATE	BID CLOSE DATE/TIME
12-0923	RFP	Wireless Network Equipment #2 (E-Rate Bid)	02/08/2012	03/07/2012 10:00AM Central
12-0921 Addendum 1	RFP	Wireless Network Equipment (E-Rate Bid)	02/08/2012	03/07/2012 9:30 AM Central
12-0922	RFP	Telephone System (E-Rate Bid)	02/08/2012	03/07/2012 9:00 AM Central

CLOSED BID OPPORTUNITIES

BID NUMBER	BID TYPE	BID TITLE	BID ISSUE DATE	BID CLOSE DATE/TIME
12-0919	JOC	Data Wiring & Installation	02/03/2012	02/10/2012 2:00 PM Central
11-0918	RFP	Uninterrupted Power Supply (UPS) (E-Rate Bid)	12/13/2011	01/11/2012 3:30 PM Central
11-11-0917 Addendum 1	RFP	Local and Long Distance Telephone Service (E-Rate Bid)	12/13/2011	01/11/2012 3:00 PM Central
11-0916 Addendum 3	RFP	Network Cabling Material and Installation, Wireless Network Equipment and Installation, and Network Equipment and Installation – South Waco (E-Rate Bid)	12/6/2011	01/10/2012 3:00 PM Central
11-0915 Addendum 2	RFP	Wireless Network Equipment (E-Rate Bid)	12/06/2011	01/10/2012 2:00 PM Central
11-0914	RFP	Coreaid San	12/06/2011	01/10/2012 2:00 PM Central
11-0897 Addendum 2	RFP	Restaurants, Catering and Fast Foods`	10/21/2011	01/6/2012 5:00 PM Central
09-0820	RFP	General Merchandise - Local Retailers, Part 2	10/20/2011	01/6/2012 11:00 AM Central
11-0900 Addendum 2	RFP	Cellular Telephone Service (E-Rate Bid)	11/28/2011	01/5/2012 2:40 PM Central
11-0899 Addendum 3	RFP	E-mail Hosting Services (E-Rate Bid)	11/28/2011	01/5/2012 2:20 PM Central
11-0913 Addendum 4	RFP	Network Cabling Material and Installation, Wireless Network Equipment and Installation, and Network Equipment and Installation – Tennyson Middle School (E-Rate Bid)	12/12/2011	01/5/2012 2:00 PM Central
11-0912 Addendum 5	RFP	Network Cabling Material and Installation, Wireless Network Equipment and Installation, and Network Equipment and Installation – Mountainview Elementary (E-Rate Bid)	11/28/2011	01/5/2012 1:40 PM Central
11-0911 Addendum 4	RFP	Network Cabling Material and Installation, Wireless Network Equipment and Installation, and Network Equipment and Installation – Lake Waco Montessori Magnet (E-Rate Bid)	11/28/2011	01/5/2012 1:20 PM Central
11-0910 Addendum 4	RFP	Network Cabling Material and Installation, Wireless Network Equipment and Installation, and Network Equipment and Installation – Kendrick Elementary (E-Rate Bid)	11/28/2011	01/5/2012 1:00 PM Central
11-0909 Addendum 4	RFP	Network Cabling Material and Installation, Wireless Network Equipment and Installation, and Network Equipment and Installation -IT Hub (E-Rate Bid)	11/28/2011	01/5/2012 11:40 AM Central
11-0908 Addendum 5	RFP	Network Cabling Material and Installation, Wireless Network Equipment and Installation, and Network Equipment and Installation – Hillcrest Elementary (E-Rate Bid)	11/28/2011	01/5/2012 11:20 AM Central

SOURCE: WISD website, March 2012.

Vendors are required to register in the district's bidding system, which includes acceptance of the terms of use, by entering company name and contact information; selecting special classifications such as economically disadvantaged business enterprise, local vendor, or small business enterprise; and designating the types of goods or services that the vendor can supply. The system then automatically notifies registered vendors of opportunities. In addition, vendors can update their information directly from the district's website instead of contacting district staff.

Use of the online bidding system helps the district to comply with local and state purchasing requirements regarding vendor notification, as well as helps to save on postage costs and staff time.

SAVINGS THROUGH JUST-IN-TIME DELIVERY SYSTEM

WISD uses a just-in-time ordering and delivery process for the purchase of common office supplies. This practice means that the district no longer stocks these items in its central warehouse, but instead uses local suppliers who can fill an order within one business day.

The district has agreements with Office Depot, Staples, and Independent Stationers. These vendors allow departments and schools to enter purchase requisitions online and have the items delivered to the requestor the next day. District procedures require purchase orders to be issued prior to ordering from an online vendor. The Purchasing Department requires users to request access codes to perform online purchasing, and codes are only provided after the user has received training from Purchasing Department personnel. The Purchasing Department is evaluating expanding the online purchasing program to include more vendors.

This process has provided cost savings to the district because it no longer has the burden of stocking these items in the warehouse. Warehouse staff no longer has to process, fill, and deliver office supplies, nor is staff required to make bulk orders that then need to be stocked, tracked, and inventoried. In addition, because the district's warehouse facility is not temperature controlled, the district has eliminated inventory waste from items containing ink, paint, toner, and other temperature-sensitive ingredients from deteriorating.

SAVINGS THROUGH COOPERATIVE PURCHASING AND INTERLOCAL AGREEMENTS

WISD's Purchasing Department maintains several agreements with purchasing cooperatives that help to save the district money while alleviating the burden of procuring bids for certain items.

Cooperative purchasing involves sharing procurement contracts between governments. TEC as well as Texas Local Government Code provides that local governments, including school districts, can participate in cooperative purchasing agreements. Texas school districts can contract or agree with other local governments, purchasing cooperatives, other school districts, or with the state or a state agency to purchase goods and services required for their operations.

The use of cooperative purchasing can save significant time and money in contract production as well as lower contract prices through the power of aggregation. That is, school districts can obtain competitive prices through cooperatives without spending the time and effort necessary to obtain bids and quotes.

Cooperative procurement contracts are usually based on the common requirements of multiple governments. Many cooperative purchasing efforts involved bulk commodities with standard specifications, such as cleaning supplies, gasoline, and fuel. More complicated requirements, including information technology services, software and consulting are also targeted for cooperative purchasing contracts. Other examples of cooperative contracts include office supplies and furniture, digital copiers and printers, carpeting, computer hardware, lab supplies, wireless radios and cell phones, paper, and fleet vehicles.

Exhibit 8–4 shows a list of some of the cooperative purchasing agreements maintained by WISD. Most cooperative purchasing arrangements are available to school districts at no cost; cooperatives are primarily supported through fees charged to participating vendors.

WISD's Purchasing Manual outlines the purpose and benefits of participating in cooperative purchasing, and lists the district's current cooperative partners. This information encourages user departments and schools to consider purchasing the goods and services needed through these agreements. Additionally, if a school or department needs assistance in using a cooperative agreement, Purchasing Department staff provides support.

By making use of cooperative purchasing, WISD is able to simplify the process and obtain significant savings. While WISD does not track the savings realized from using cooperative purchasing, independent studies show that this

EXHIBIT 8–4
WISD COOPERATIVE PURCHASING AGREEMENTS

COOPERATIVE ENTITY	INITIAL DATE OF AGREEMENT
Texas Association of School Boards (TASB) BuyBoard	January 2001
Capital Metro	April 2007
Central Texas Purchasing Alliance (CTPA)	April 2005
City of Waco	August 1996
City of Ft. Worth	March 2011
Comptroller of Public Accounts (CPA) Contracts (formerly the Texas Building and Procurement Commission)	March 1992
Harris County Department of Education (HCDE)	September 2004
Houston-Galveston Area Council of Governments (HGAC)	November 1996
Purchasing Solutions Alliance (PSA)	June 2008
Texas Cooperative Purchasing Network (TCPN) operated by Region IV Education Service Center	October 2000
Texas Interlocal Purchasing System (TIPS) operated by Region VIII Education Service Center	January 2006
Tarrant County Purchasing Cooperative	September 2003
Tejas School Services Purchasing Cooperative	March 2001
US Communities in Schools	July 2003

SOURCE: WISD list of cooperative purchasing agreements provided by the Purchasing Department, November, 2011.

procurement method can provide meaningful savings for school districts.

DETAILED FINDINGS

AUTOMATED PURCHASE ORDERS (REC. 30)

WISD continues to use some manual processes, resulting in inefficiencies in the purchasing process that leaves the district at risk of potential errors.

Purchase requisitions are electronically routed throughout the district – from the initiating department to all individuals needing to approve the order – until they reach the Purchasing Department. This method provides an efficient way of routing purchase requests through the various stages of approval. When the Purchasing Department receives an electronic purchase requisition, staff reviews it to ensure that it has been coded with the proper budget codes, that the vendor is an approved vendor, and that the requisition has received proper approval. Staff then "converts" the requisition into a purchase order which records the intended purchase in the district's accounting records and assigns a purchase order number.

From this point, purchase orders are printed through an electronic conversion process, submitted to a printer as a batch printing job, and then manually submitted to the director of Purchasing for review. Upon the director's approval, the purchase orders are mailed, e-mailed, or faxed to vendors, with paper copies of the orders going to the originating department or school and to Accounts Payable staff. This manual distribution process can slow down the procurement process as well as cost the district in terms of postage expenses and staff time needed to mail and distribute the paper purchase orders.

Furthermore, the receiving process is also manual. That is, when the initiating department receives the goods that they ordered, they make note of receipt on their copy of the paper purchase order and then send the marked-up purchase order to Accounts Payable for payment. Manual receipt of goods is time-consuming and can often lead to lost or misplaced paperwork.

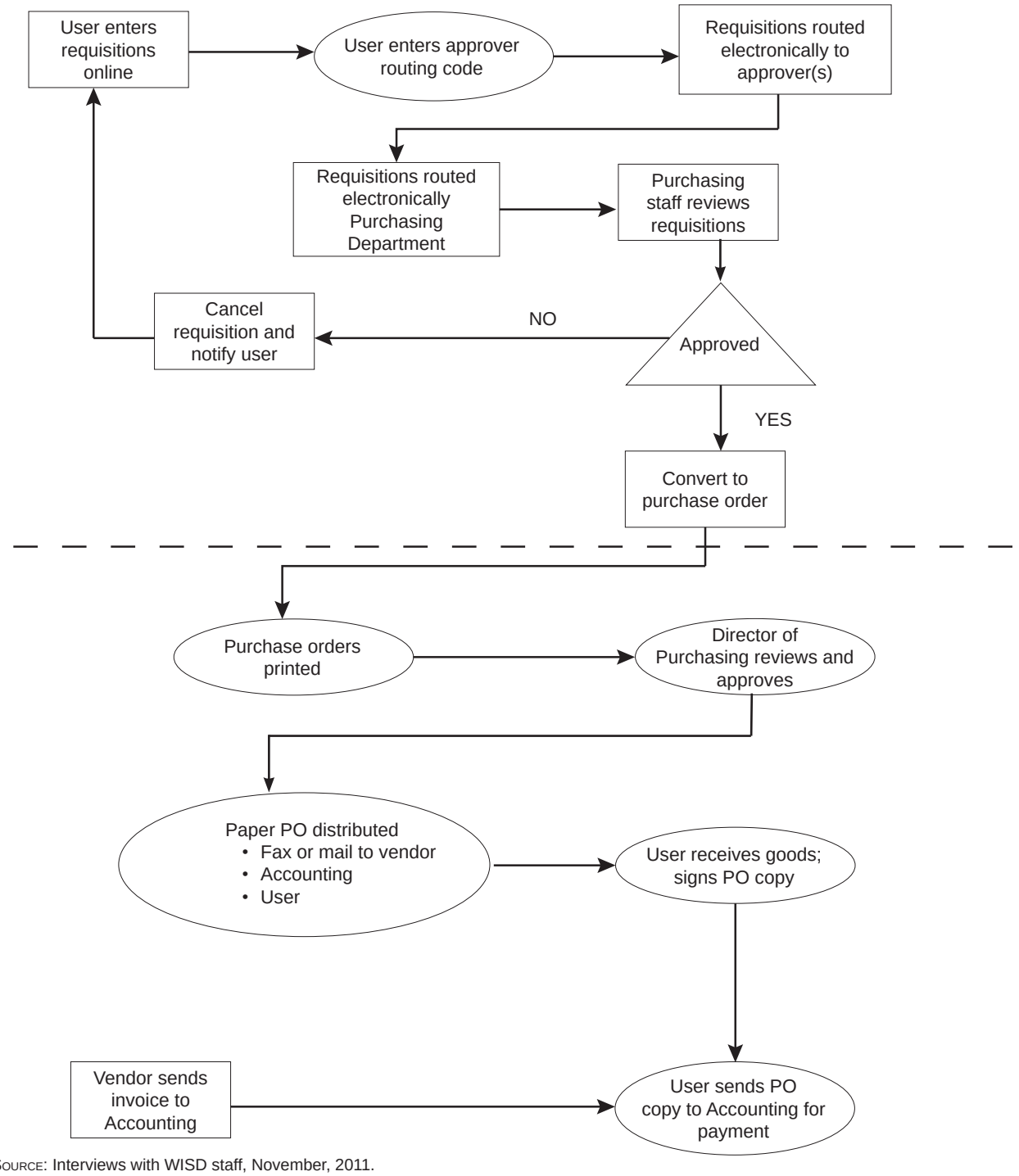
Although the routing of purchase requisitions for approval purposes is electronic, the initiating department is required to enter routing codes when entering the requisition. When a requisition is received in the Purchasing Department, staff must review the order to determine whether proper approvals were obtained.

Many purchases can be made with a single approval from a department head or principal, but specialized items or items purchased with grant funds need additional approval.

Manually entering routing codes can become cumbersome for all but the most basic purchases.

Exhibit 8–5 shows a diagram of the district's purchase order process. The square boxes represent automated steps in the process, while the oval shapes represent the manual processes.

EXHIBIT 8–5
WISD PURCHASE ORDER PROCESS



SOURCE: Interviews with WISD staff, November, 2011.

Virtually all processing points that fall below the dotted line in **Exhibit 8–5** are manual processes that, if automated, would make the process more efficient.

Another manual process that the review team identified includes the manual processing of purchase requisitions for the district's warehouse.

All of these manual processes – distribution of purchase orders, keying of routing codes, and manual purchase order processing for warehouse orders, are due to limitation of the district's purchasing software.

WISD should implement electronic receiving functions as well as electronic distribution of approved purchase orders and automated purchase orders for warehouse supplies to ensure that the district's purchasing processes are obtaining maximum efficiencies. The Human Resources Management and Financial Management chapters of this report discuss the need for the district to upgrade the eFinancePLUS system. In doing so, the director of Purchasing should be included in the upgrade process to ensure that the purchasing component of the software is fully updated and that processes can be fully automated. In addition, routing codes should be automated by linking approval required to budget codes.

The district at this time is limited in the way it must manually process purchase orders for the warehouse, but the director of Purchasing should ensure that this issue is corrected with a new system upgrade. The director should coordinate with the district's Technology Services Department to work with the software vendor in developing a solution to this issue at the time of the upgrade.

The cost of upgrading the financial component of the system will include upgrades to the purchasing module, and has been included in the district's budget. Implementing these changes once the system has been upgraded can be accomplished with existing resources, but will require time on the part of Technology Services and Purchasing staff as well as the time necessary to train system users in the new process. In addition, defining the work flow for automated approval routing will initially take some time on the part of the Purchasing Department staff, but should help alleviate a manual review step of ensuring that proper approval was obtained for purchase requisitions.

CONTRACT MONITORING AND NEGOTIATIONS (REC. 31)

WISD does not have adequate oversight of contract monitoring from district personnel for some of its contracts. Without adequate monitoring, the district cannot be assured that all contracts and vendor performance are being overseen in a consistent and effective manner. This situation puts the district at risk of entering into contracts that may not be favorable to district interests.

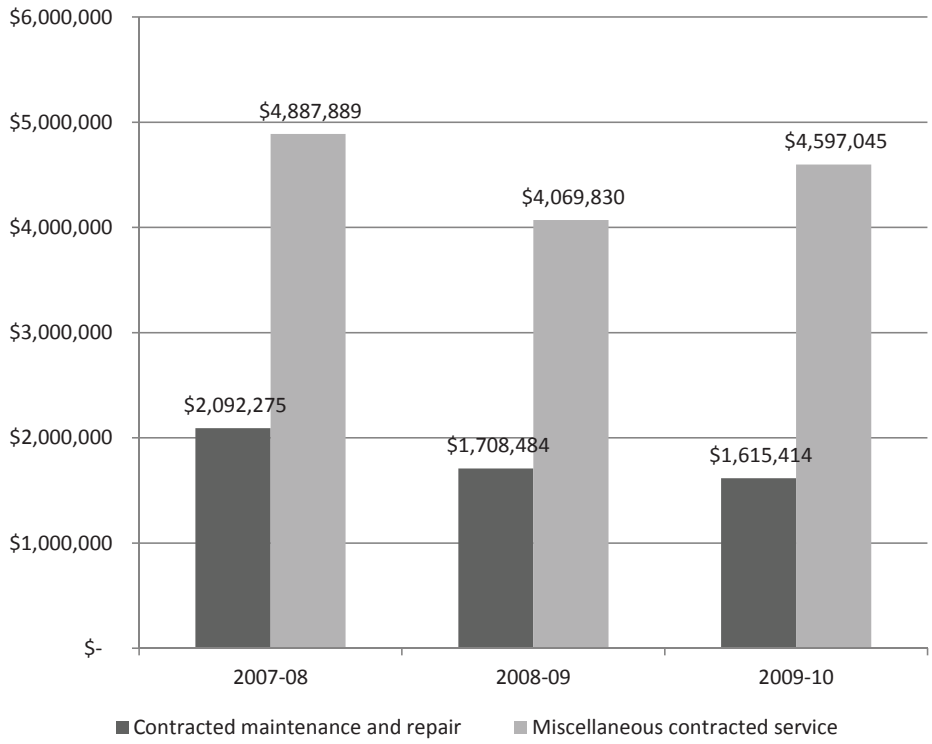
The district's contracting process is managed by the Purchasing Department. In accordance with Chapter 44, Section 031(a) of the TEC, all district contracts valued at $50,000 or more are made by competitive bidding, competitive sealed proposals, requests for proposals, interlocal agreements, or reverse auction procedures. Contracts for the purchase of produce or vehicle fuel are not required to be bid. Board Policy CH (LOCAL) requires that any district purchase that costs $50,000 or more shall have board approval before a transaction may take place unless the vendor is approved through a state contract or purchasing cooperative. Further, policy requires that for any contract awarded in the amount of $25,000 and $50,000, the Purchasing Department shall notify the board. The director of Purchasing is responsible for including bid and contract items on the board's agenda, and responds to the board regarding any questions they may have about district procurement.

The director of Purchasing is also involved in contract negotiation, either directly or indirectly. For instance, there are several contracts that this position negotiates. These include the recent fuel card contract, the district's recycling contract, as well as more routine contracts such as bid awards for athletic equipment and classroom supplies. Some contracts are negotiated by others in the district. The director of Purchasing ensures that the district's standard language is included in all contracts, and this position provides oversight to ensure that district policies are followed. When the district issues a contract, any purchases made off that contract must be made through a purchase order. The director of Purchasing reviews and approves all purchase orders and ensures that all payments are in accordance with contract terms.

Exhibit 8–6 shows the contract expenditures for WISD for 2007–08 to 2009–10 as reported in Public Education Information Management System (PEIMS). This data shows that the district has spent more than $5 million each year in contract expenditures.

It is common to outsource the management of certain functions to an outside contractor. However, outsourcing requires that personnel within the district be responsible for overseeing the outsourced contracts to ensure vendor compliance. Although the review team found the district to

EXHIBIT 8–6
WISD CONTRACTED SERVICES EXPENDITURES
2007–08 TO 2009–10



SOURCE: Texas Education Agency, PEIMS, 2007-08 to 2009-10.

have adequate contracting oversight in most areas, two significant district contracts do not have sufficient monitoring from district personnel. The district has contracted with Sodexo for the past 22 years to operate its cafeterias and manage the food services in the district. This vendor provides management oversight, but the cafeteria workers are district employees. The district's contract with the vendor is lacking adequate program oversight. Further, the terms of the food service contract are not favorable to the district in that the food service operation is not required to reimburse the district for custodial services provided on behalf of the district.

The review team also found that there is a lack of district oversight of the transportation operator, Student Transportation Specialist, LLC (STS). STS has been the transportation vendor for WISD since 2006. STS provides the district with route management as well as bus drivers. WISD owns its bus fleet. Primarily, the vendor is in charge of the development and design of bus routing, and may not be operating routes in the most cost effective manner. This directly impacts the district's transportation expenditures.

The review team further found that WISD's contracting function has not been audited in recent years. The volume and dollar amount of contracts, as shown in **Exhibit 8–6**, is a high-risk area for the district and could have potential negative financial implications. Regular internal audit practices would require that contracts be audited due to the dollar volume involved and due to the nature of contracts.

The district should fully develop and implement contract oversight procedures to ensure that all of the district's contracts are adequately monitored and negotiated, and that contracts are audited on a regular basis, with audit results reported to the Board of Trustees.

Implementing contract oversight processes is the responsibility of the director of Purchasing and the assistant superintendent for Business and Support Services and can be accomplished with existing resources. To ensure proper oversight for all contracts, the director of Purchasing should make a list of all contracts and who in the district is responsible for the oversight of each contract. If a contract is determined to have no district personnel assigned to oversee

it, the director of Purchasing and the assistant superintendent for Business and Support Services should assign responsibility and train the individual assigned in how to manage the contract and in proper procedures to take in the event the contractor is not in compliance with contract terms.

Furthermore, during contract re-negotiations, the director of Purchasing and/or the assistant superintendent for Business and Support Services should develop detailed spreadsheets showing the fiscal impact estimates of re-negotiated contract terms. Specifically, the district should ensure that upon renegotiation of the food services contract that the contractor be required to fully support cafeteria operations by reimbursing the district for custodial costs. The implications of contract negotiations should be presented to the board so that board members can fully understand the reasons for contract changes, and have a basis to evaluate whether new terms are in the district's best interest. The fiscal impact assumes that the district can accomplish the audit either through the internal audit function or through an outside audit firm. If the contract function is audited by an internal auditor, there will be no fiscal impact.

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		2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
30.	Implement electronic receiving functions as well as electronic distribution of approved purchase orders and automated purchase orders for warehouse supplies to ensure that the district's purchasing processes are obtaining maximum efficiencies.	$0	$0	$0	$0	$0	$0	$0
31.	Fully develop and implement contract oversight procedures to ensure that all of the district's contracts are adequately monitored and negotiated, and that contracts are audited on a regular basis, with audit results reported to the Board of Trustees.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 8		**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

CHAPTER 9

CHILD NUTRITION SERVICES

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 9. CHILD NUTRITION SERVICES

Effective food service operations provide students and staff appealing and nutritious breakfasts and lunches at a reasonable cost in an environment that is safe, clean, and accessible. Ideally, the department will be fiscally self-sustaining, while offering meals that meet all local, state, and federal requirements.

For the past 22 years, Waco Independent School District (WISD) has contracted with Sodexo, a food service management company (FSMC), to operate the Child Nutrition Program (CNP) in the district. There are five Sodexo employees: the food service director, the operations manager, two food service supervisors, and a professional chef. There are also 149 employees in the Food Service Department that are WISD employees: two office staff, two warehouse workers, and 144 kitchen workers.

Each of WISD's 32 campuses has an onsite kitchen where food is prepared and served. All campuses are closed meaning that students are not allowed to leave campus during the meal period. WISD participates in the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Afterschool Snack Program, and the Summer Food Service Program. The district currently operates a universal breakfast program districtwide; each WISD student, regardless of household income, is provided a breakfast at no charge. The district is piloting breakfast-in-the-classroom in select schools.

The CNP is funded by federal reimbursement for free, reduced-price, and full-price meals; state matching funds; and local revenues from the sale of meals and a la carte foods. WISD also provides catering services within and outside the school district. All catering revenues are returned to the CNP. The food service proposed operating budget for school year 2009–10 was $8,297,999. During September 2011, the average daily participation (ADP) in the NSLP was 12,070 of 15,272 total students, or 79 percent. The ADP at breakfast was 7,756 students, or 51 percent.

The information in **Exhibit 9–1** represents the proposed revenue generated by the district's participation in the NSLP and the SBP, including all cash sales, federal reimbursement and other funding, and state matching funds. **Exhibit 9–2** notes the district's proposed budget for the 2009–10 expenditures by category. In **Exhibit 9–2** USDA FOOD represents the value of United States Department of Agriculture (USDA) donated foods.

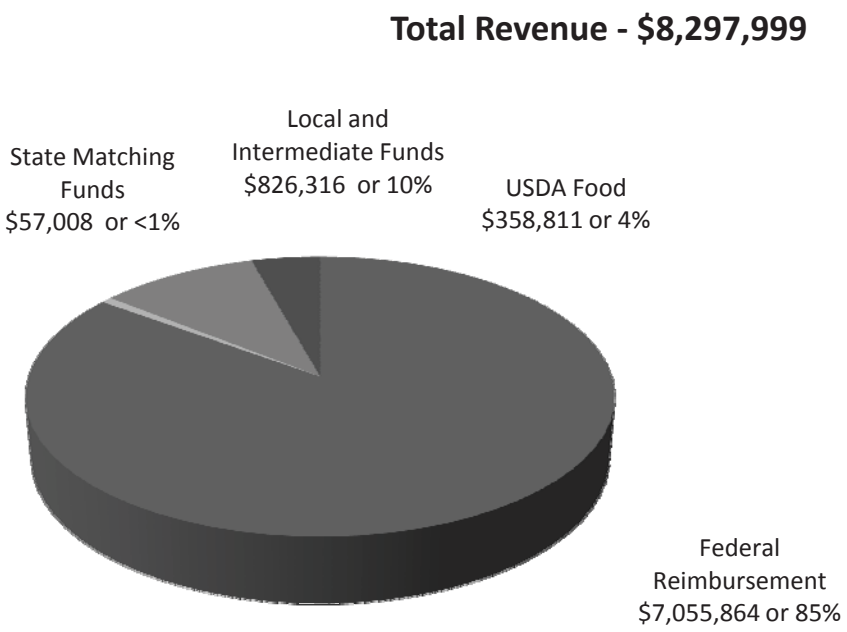
ACCOMPLISHMENTS

- WISD initiated the Pack of Hope to support the district's efforts in ensuring that students are fed over weekends and holidays.
- Crestview Elementary School provides a novel approach to increasing breakfast participation in the district.
- The district provides the A to Z Salad Bar at each of the elementary schools to focus on nutrition awareness and healthy eating.

FINDINGS

- WISD does not have a comprehensive oversight plan to remain directly involved in, and closely monitor Child Nutrition Program operations to ensure that the district is in compliance with all state and federal regulations; and to ensure program funds are maximized to deliver the highest affordable quality of food and service to WISD students.
- WISD uses procedures for counting meals in the elementary schools that do not yield accurate claims of reimbursable breakfasts served in the classrooms, and breakfasts and lunches served in the cafeteria.
- WISD does not fully realize the nutritional value to students and the revenue available as participation in the school breakfast program is low at some campuses.
- WISD does not monitor to ensure that adequate nutrient analysis documentation is maintained to demonstrate that the district meals claimed for federal reimbursement met the requirements of the Nutrient Standard Menu Planning approach.
- WISD does not monitor to ensure that school personnel are following standardized recipes; therefore, food production records which list amount prepared in multiples of a recipe do not actually document the content of the menu items prepared, served, and claimed for reimbursement.

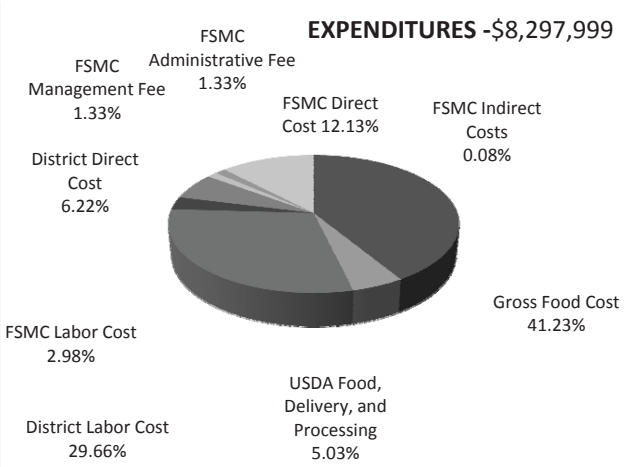
EXHIBIT 9–1
WISD TOTAL REVENUE BY SOURCE FOOD SERVICE BUDGET (PROPOSED)
2009–10



CASH SALES	
Student Breakfast Sales	$0
Student Lunch Sales	$418,556
Student a la Carte Sales	$92,377
Adult Sales	$284,423
Catering Sales	$30,960
Total Cash Sales	**$826,316**
STATE AND FEDERAL REIMBURSEMENT/FUNDING	
National School Lunch Program	$4,821,653
School Breakfast Program	$1,710,826
Snacks	$173,385
Summer Food Service Program	$350,000
State Matching Fund	$57,008
TOTAL REIMBURSEMENTS	**$7,112,872**
USDA FOODS	$358,811
TOTAL REVENUES	**$8,297,999**

NOTE: Total revenues are the sum of all the cash sales and all the state and federal funding including the value of USDA foods.
SOURCE: WISD Food Service Budget (Proposed); school year 2009–10.

EXHIBIT 9–2
WISD TOTAL EXPENDITURES BY SOURCE FOOD SERVICE BUDGET (PROPOSED)
2009–10



EXPENDITURES	
FOOD COSTS	
Gross Food Costs	$3,421,312
Commodities Used	358,811
Commodity Delivery	20,200
Commodity Processing	38,000
TOTAL FOOD COSTS	**$3,838,323**
FSMC LABOR COSTS	
FSMC Base Gross Salary	$201,100*
FSMC Fringe Benefits	46,441
Total FSMC Labor Costs	**$247,541**
DISTRICT LABOR COSTS	
District Gross Salaries	$1,772,428
District Fringe Benefits	582,341
District Payroll Taxes	19,925
District Worker's Compensation	86,791
Total District Hourly Staff Costs	**2,461,485**
Total District Labor Cost	**$2,709,026**
FSMC FEES	
Administrative Fee Costs (0.0659 per meal)**	$110,678
Management Fee Costs (0.0659per meal)**	$110,678
Total FSMC Fees	**$221,356**
FSMC Direct Costs – Subcategory Examples	
Paper and Disposable Goods	$351,201
Replacements/Small wares	30,609
Contracted Labor	88,000
Auto Expenses	45,000
Insurance Expense	12,037
Telephone	8,320
Office Supplies	67,500
Postage	9,900
Bank Deposit Services	51,500
Uniforms and Laundry	38,700
Other Delivery and Freight - Non-Food	0
Advertising, Promotions and Menus	9,100
Marketing and Decor	6,000
Technology Expense	43,500
Equipment Repair	123,000
Capital Equipment Expenditure	56,000
Licenses	5,200
Employee Travel	10,027
Miscellaneous – Cleaning Supplies	36,700
Miscellaneous – Pest Control	14,000
Total FSMC Direct Costs	**$1,006,294**
District Direct Costs	
Utilities	$467,500
Copier Rental	6,000
Warehouse Products (paper and cleaning)	42,500
Total District Direct Costs	**$516,000**
Total Direct Costs	**$1,522,294**
FSMC Indirect Costs	
Technology Expense	$7,000
Total FSMC Indirect Cost	**$7,000**
Total Expenses – Food, Labor, Fees, Direct and Indirect Costs	**$8,297,999**

*This figure represents three full time employees; two employees have been added this year.
**Administrative and management fees have increased to 0.0693 each for the current school year.
SOURCE: WISD Food Service Budget (Proposed), school year 2009–10.

- WISD does not monitor to ensure that the Offer versus Serve provision in the service of breakfast or lunch has been properly implemented.
- There was excessive tray waste for breakfast and lunch at all of the visited elementary schools; and moderate tray waste at lunch at the Brazos Middle and Waco High Schools.
- Higher cost disposable service ware is being used in cafeterias.
- The student and adult full-price lunch prices do not cover the cost of producing and serving the meals.
- The use of branded products for sale in the Waco High School reduces the profits and the value provided students through the Child Nutrition Program.
- WISD routinely uses employees from a temporary agency to staff kitchens which increases the per hour cost of that labor by an estimated 25 percent.
- WISD does not independently research the prices paid for food including rebates and credits as compared to those paid by other districts in the surrounding area who are participating in the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative. The district does not consolidate and reconcile individual school invoices from food distributors to validate the monthly direct food costs charged by the food service management company.

RECOMMENDATIONS

- **Recommendation 32: Develop a comprehensive oversight plan to ensure that the district is in compliance with all state and federal regulations governing the Child Nutrition Program, and that program funds are maximized to deliver the highest affordable quality of food and service to students.**
- **Recommendation 33: Submit a revised breakfast in the classroom collection procedure to the Texas Department of Agriculture for approval; and monitor all meal service to ensure that methods used in the point of service conform to the approved counting and claiming procedures.**
- **Recommendation 34: Develop strategies for increasing student participation in the School Breakfast Program.**
- **Recommendation 35: Monitor Child Nutrition Program operations to ensure that current and accurate nutrient analysis of all meals, by school and menu cycle, meet the federal requirements for reimbursable meals served under the Nutrient Standard Menu Planning approach.**
- **Recommendation 36: Monitor kitchen operations to ensure that accurate food production records are maintained and that district standardized recipes are followed for every preparation.**
- **Recommendation 37: Monitor Child Nutrition Program operations to ensure that all food service staff members are trained on the proper implementation of Offer versus Serve; and that the provision is properly implemented in all schools for breakfast and lunch.**
- **Recommendation 38: Monitor Child Nutrition Program operations to ensure that plate waste studies are conducted and strategies are developed for reducing the amount of food students are discarding.**
- **Recommendation 39: Evaluate the cost of disposable service ware used to determine potentially less expensive alternatives.**
- **Recommendation 40: Raise adult and student full-price lunch prices to ensure that the revenue generated is sufficient to cover the cost of preparing and serving the meals.**
- **Recommendation 41: Remove branded products from the Waco High School menu and substitute in-house brands, or other reimbursable offerings on those serving lines.**
- **Recommendation 42: Develop a pool of substitute employees from which to draw to eliminate the added costs of using an agency.**
- **Recommendation 43: Compare the food prices paid through the food service management company to the prices paid by the members of the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative; consolidate and reconcile distributor invoices to validate direct food costs prior to paying the food service management company monthly invoice.**

DETAILED ACCOMPLISHMENTS

PACK OF HOPE FOR STUDENTS IN NEED

WISD initiated the Pack of Hope (PoH) to support the district's efforts in ensuring that students are fed over weekends and holidays. Led by the WISD food service director with the support of the staff—and in coordination with McLennan County Hunger Coalition, the Food Planning Task Force under the Waco Chamber of Commerce, the Baylor-based Texas Hunger Coalition, and several local faith organizations—the district initiated PoH, which began operating from the WISD warehouse in the spring of 2010. PoH supplies participating school districts and their eligible students with backpacks filled with nutritious food to prevent hunger from Friday through Sunday while they are out of school. PoH uses the WISD Child Nutrition Services (CNS) warehouse to store the food items, hold the filled backpacks, and serve as the distribution center. Volunteers congregate at the WISD CNS warehouse each Thursday to pack the backpacks. Plastic bags are filled and picked up each Friday for 9 of 18 public school districts in McLennan County. The backpacks are taken to the schools where the counselors have identified the children in most need of the service. Volunteers inconspicuously give the backpacks to the recipient children who put them in their regular school backpacks to be taken home. The children receiving the foods are not overtly identified. Donations of food for the program have come from local vendors such as Sam's, HEB, Oak Farms, SW Dairy Council, and Coca Cola. Monetary donations have come from many local residents and companies. After beginning with 30 backpacks for three WISD schools in 2010, the program has grown to serve 411 students in nine different districts. Currently, over 25,643 students in McLennan County qualify for free and reduced meals and out of that group, based upon the funding currently available, a formula is in place based upon the October TEA snapshot numbers, which determines how many backpacks each participating school district receives each week. As donations increase, the number of backpacks will increase. With the exception of a small cost for printing, all funds received go to procuring food for the backpacks.

MODEL FOR INCREASING BREAKFAST PARTICIPATION

Crestview Elementary School provides a novel approach to increasing breakfast participation in the district. The Crestview Elementary School Cougars begin every school day with a den meeting held in the cafeteria. All the students enter through the front doors and proceed to the cafeteria where they are offered breakfast to begin their day. They are not required to, but are encouraged by the staff on duty to participate in the SBP. Regardless of whether students eat or not they remain in the cafeteria for the pledges, announcements, the Crestview school song, and a moment of silence. Students participate on stage in leading the pledges and song. By the end of the year, every student has had the opportunity to be on stage to lead. The principal explains that this daily event not only allows the students time for breakfast, but it also gets them engaged and ready to start their day. In this school, the cafeteria is large enough to hold the entire student body. When students are late, they are allowed to select a breakfast and take it with them to the classroom for consumption. Although participation is not as high as in schools serving breakfast in the classroom, it is higher than in many other district elementary schools. This alternate system of providing the opportunity for every child to receive breakfast each morning supports food service in two ways. It reduces the labor used wrapping all foods and delivering them to the classroom as well as the retrieval and handling of the leftover foods once breakfast is completed; and it allows food service to offer a greater variety of foods as daily choices on the menu. This model can be used as one of the approaches that a district can use to increasing breakfast participation throughout the district.

PROGRAM FOCUSING ON NUTRITION AWARENESS

The district provides the A to Z Salad Bar at each of the elementary schools to focus on nutrition awareness and healthy eating. Administrators, teachers, and students enthusiastically participate in this very special presentation of fruits and vegetables which was developed especially for elementary students by the food service management company (FSMC). The program focuses on nutrition awareness and healthy eating by featuring an engaging salad bar for children to enjoy while learning about the many benefits of fruits and vegetables. Complementing the salad bar presentation is a variety of educational materials that highlight fresh fruits and vegetables, beginning with each letter of the alphabet. Together, these two components make for a healthy, delicious, and educational student experience.

DETAILED FINDINGS

PROGRAM OVERSIGHT (REC. 32)

WISD does not have a comprehensive oversight plan to remain directly involved in, and closely monitor the Child Nutrition Program (CNP) operations to ensure that the district is in compliance with all state and federal regulations; and to ensure program funds are maximized to deliver the

highest affordable quality of food and service to WISD students. During onsite review of the district's CNP, it was noted that the district places significant reliance on the FSMC to oversee all aspects of the food service program. In an interview with district officials, it was stated that the district contracts with a FSMC for their expertise in the operation of CNP, and that the district trusts that all required tasks are completed as necessary under the direction of the FSMC. Consequently, the review team observed that the district's dependence on the FSMC may have led to disparities between regulatory requirements and district actions. Examples include:

- claiming federal reimbursement for breakfasts that do not meet meal pattern requirements as served in the classrooms at Bell's Hill and South Waco Elementary Schools;
- failing to conform to the collection method outlined in the district's policy statement yielding an inaccurate count for claiming reimbursable breakfasts and lunches served in all visited elementary schools;
- failing to follow standardized recipes and maintain accurate food production records as documentation of the meals served and claimed;
- failing to properly implement Offer versus Serve;
- lacking adequate nutrient analysis documentation to demonstrate that the district meals claimed for federal reimbursement during school year 2011–12 (and prior years) met the requirements of the Nutrient Standard Menu Planning (NSMP) approach; and
- ensuring the FSMC maintains accurate records needed by the district in submitting its claim for reimbursement.

While districts may contract with an FSMC to manage the school food service operations, they may not delegate certain duties to the FSMC. Districts, not FSMCs, are responsible for the following:

- observing the limitations on the use of the district's nonprofit food service revenue account. This task includes using the CNP account funds to pay only allowable costs billed by the FSMC, net of all discounts, rebates, and other applicable credits accruing to or received by the contractor or any assignee under the contract, to the extent those credits are allocable to the allowable portion of the costs billed to the school food authority;
- determining the eligibility of children for free and reduced-price meal benefits;
- ensuring that only reimbursable meals are included on the claim for reimbursement, regardless of the total number of meals billed for by the FSMC;
- retaining financial responsibility for payment of the storage and distribution of United States Department of Agriculture donated commodities;
- ensuring income and expenses do not accrue to the FSMC; and
- monitoring the FSMC's food service operation through periodic onsite visits.

According to the United States Department of Agriculture (USDA), "under their agreements with a State Agency, school food authorities (SFAs) are responsible for operating the CNP in schools under their jurisdiction." To assist in carrying out this responsibility, a SFA may contract with a food service management company (FSMC) to manage its food service operation involving these programs in one or more of their schools."

If a district contracts with a FSMC, the district remains responsible for the overall operation of the child nutrition program. Federal guidelines for a district that contracts with a FSMC state that "… a district retains and maintains direct involvement in the operation of the food service." In addition, the guidelines also suggest that a district contracting with a FSMC should have a sufficient number of knowledgeable staff to coordinate, monitor, review, and control food service operations and to perform the responsibilities that must be retained by the district.

Moreover, a district that uses an FSMC must also contract with their state agency, in the case of WISD, the Texas Department of Agriculture (TDA). TDA, in turn, has a contract with the USDA. It is the district—not the FSMC—that is responsible for the following:

- ensuring that the terms of that contract are met and that the district is in compliance with all state and federal regulations governing the operations of the CNP;
- retaining signature authority on the state agency-school food authority agreement, free and reduced-price policy statements and claims; and

- ensuring that contract language confirms the SFA's responsibility for monitoring the food service.

For the past 22 years, WISD has contracted with Sodexo, a food service management company (FSMC), to operate the CNP in the district. The district's current contract is from an annual contract that may be renewed for four additional terms of one year each upon mutual agreement between the district and the FSMC.

A contract between the district and the FSMC must be submitted unsigned by the school food authorities to TDA by April 30 of each year. TDA may make recommendations or direct changes to the terms listed on the document. If changes are made by the district, the contract must be resubmitted to TDA for reevaluation and final approval. Once the contract is approved and signed by the district and FSMC, it is due to TDA no later than July 1, when TDA approves the document. TDA will not release funds to the district to pay for its FSMC contract if the document is altered without TDA approval. **Exhibit 9–3** presents the district's 2011–12 contract terms with the FSMC.

The USDA provides districts with specific guidelines related to monitoring and recordkeeping responsibilities if the district contracts with an FSMC. **Exhibit 9–4** summarizes the district's responsibilities for monitoring the FSMC and its CNP.

Districts must ensure the resolution of program reviews and audit findings. If a district does not closely plan for and monitor services being provided through its CNP, it risks not only the potential for being out of compliance with federal and state regulations and the potential to be sanctioned, but

EXHIBIT 9–3
WISD CONTRACT TERMS WITH FOOD SERVICE MANAGEMENT COMPANY

TYPE OF CONTRACT

COST REIMBURSABLE OPTION -

- The Food Service Management Company (FSMC) charges a fee for general and administrative expenses ($0.0659) meal/ meal equivalent) and management of food service operations ($0.0659) meal/meal equivalent). Total FSMC fee for meal/meal equivalent is $0.1318.
- Meal equivalency rate, $2.80 55 (the equivalency factor for the Meal Equivalent shall remain fixed for the term of the contract and all renewals.)

SERVICES PROVIDED BY FSMC

- National School Lunch Program – all campuses
- School Breakfast Program – all campuses; breakfast in classroom at South and North Elementary Schools
- Afterschool Snack Program
- Summer Food Service Program
- A la carte
- Fresh Fruit and Vegetable Program
- Adult Meals
- Catering
- Contract Meals
- Disaster Feeding as a backup to the Red Cross
- Potentially Child and Adult Care if the district opens day care facility
- Vending of Milk upon request

PROGRAM EXPENSES – DISTRICT RESPONSIBILITY

Food - food purchases, commodity processing charges, processing and payment of invoices

Labor - FSMC and District Employees

- FSMC Employees – salaries/wages, fringe benefits and insurance, retirement, payroll taxes, workers' compensation, unemployment compensation
- District Employees - salaries/wages, fringe benefits and insurance, retirement, payroll taxes, workers' compensation, unemployment compensation
- FSMC bills for direct and some indirect costs.

Other Expenses –

- paper disposable supplies
- cleaning/janitorial supplies
- janitorial services
- china/silverware/glassware
- telephone local and long distance calls
- pest control
- equipment replacement and repair
- auto expenses
- postage
- storage costs for food/supplies
- bank deposit services - courier
- printing
- promotional materials
- telephone
- employee travel
- uniforms and laundry

SOURCE: United States Department of Agriculture (USDA), Contracting with Food Service Management Companies – Guidance for School Food Authorities, June 1995.

EXHIBIT 9–4
DISTRICT MONITORING RESPONSIBILITIES FOR CONTRACTED CHILD NUTRITION PROGRAMS

Monitor the operation of the FSMC through periodic onsite visits to ensure that the FSMC complies with the contract and any other Federal, State and local rules and regulations. Maintain documentation of district monitoring activities, any corrective action required, and whether or not corrective action was taken. Monitoring activities include evaluating:

- Cycle menus and adherence to meal pattern requirements;
- Claim documentation - records, by school, to support the Claim for Reimbursement (meal/milk counts and any other data on the claim for which the FSMC is responsible);
- Cost records - records that include source documentation supporting charges for contractually approved costs (such as food invoices) for cost–based contracts, (e.g., time and attendance records for staff hours charged);
- Meal count records - records for meals not covered by the Claim for Reimbursement, e.g., adult meals;
- Revenue records - records broken down by source, type and category of meal or food service, e.g., a la carte sales, reduced price and full price NSLP and SBP meals, vending machine sales;
- Outside food service activities such as catered events;
- Preparation facilities;
- USDA donated foods;
- Conduct onsite school review and monitor the following elements of the child nutrition program through these reviews;
- Compliance with civil rights requirements;
- Adherence to the district's approved free and reduced price meal policy statement;
- Compliance with OVS requirements;
- Compliance with competitive food requirements of the NSLP regulations in all schools by all parties; and
- Compliance with all policies established by the district.

SOURCE: United States Department of Agriculture (USDA), Contracting with Food Service Management Companies – Guidance for School Food Authorities, June 1995.

more importantly, it may be doing a disservice to program participants in not providing the best affordable services.

WISD should develop a comprehensive oversight plan to ensure that the district is in compliance with all state and federal regulations governing the CNP programs, and that program funds are maximized to deliver the highest affordable quality of food and service to students. The following may be part of the plan:

- Analyze and validate all proposed expenditures prior to awarding or renewing the FSMC contract. Each proposed expenditure should be determined to be necessary in contributing to the quality of the programs as defined by the district. The current year's expenditures should be compared to the contract's proposed expenditures for the purpose of evaluating the proposal for the following year.
- Create a checklist with a timeline indicating monitoring tasks to be accomplished in an effort to guide the activities of the FSMC and district food service employees, to ensure compliance with program regulations, and to provide the delivery of quality food and service to the students of WISD. Suggested activities may include:
  - ensuring district cafeteria managers receive written procedures for following standardized recipes and maintaining accurate food production records to support the district's claim for reimbursable meals; training from the FSMC; and monitoring for compliance with those procedures by a district reviewer;
  - ensuring teachers participating in the universal breakfast program receive written procedures and training in understanding the counting and claiming of reimbursable meals;
  - ensuring counting and claiming procedures as described in the district's policy statement on file with TDA are being followed;
  - ensuring that OVS is implemented properly in all schools at both breakfast and lunch; and

- conducting random and routine onsite visits to cafeterias during meal service to monitor tray waste, discuss any findings with students, cafeteria aides, staff, and managers, and work with the director of food service to make necessary changes.

TDA has outlined a Self-Assessment Tool beginning on page 23.15 of the Administrator's Reference Manual (ARM) which may be found at: http://www.squaremeals.org/Portals/8/files/ARM/ Section percent2023-CRE.pdf. This document may provide suggestions for additional activities to be included in the monitoring activities.

This recommendation can be implemented using existing resources.

BREAKFAST AND LUNCH COUNTING PROCEDURES (REC. 33)

WISD uses procedures for counting meals in the elementary schools that do not yield accurate claims of reimbursable breakfasts served in the classrooms, and breakfasts and lunches served in the cafeteria.

BREAKFAST IN THE CLASSROOM

Teachers have not been trained on how to identify a reimbursable meal and are using attendance rosters as the meal count for breakfast in the classroom. Teachers did not identify the student breakfast selections as an essential component of counting reimbursable meals. If the student was present and selected one item, they were counted as having received a reimbursable breakfast.

BREAKFAST AND LUNCH IN THE CAFETERIA

Of the reviewed elementary schools serving breakfast and lunch in the cafeteria, all had deviated from the approved collection procedure at breakfast and lunch. Each line had a cash register, and students had cards to be scanned; however, instead of providing the child with his/her card to present at the point of service (POS) various systems had been devised for the cards to be presented to the cashier in stacks, by classroom. Each of the systems involved backing out the count of students not in attendance. The cards were scanned after meal service in each of the elementary schools reviewed.

Regulations define a POS meal count as "that point in the foodservice operation when a determination can accurately be made that a reimbursable free, reduced-price or full-price meal has been served to an eligible child." Acceptable POS counting and claiming procedures are required for determining reimbursable meals. Any counting/collection procedure used must provide for someone stationed at the end of the serving line to monitor the meals selected to ensure that each meal claimed for reimbursement meets meal requirements. In addition, the procedure must provide a method for removing any meal that is not reimbursable from the proper meal count category.

Although compliance with all state and federal regulations is imperative in the operation of the CNP, districts must exercise diligence in self-monitoring compliance in the critical areas addressed in the Coordinated Review Effort (CRE) in order to protect their reimbursement. It is in these areas that an overclaim may be established by TDA and reimbursement reclaimed, meaning the district must reimburse funds claimed in error.

Critical areas of the review are composed of Performance Standard 1 (Meal Counting and Claiming) and Performance Standard 2 (Meal Components and Quantities). The district must ensure that the number of meals counted and claimed for reimbursement is accurate, and the meals claimed met meal pattern requirements or they risk losing funds. Fiscal action could result if a CRE reviewer notes an overclaim due to violations in either of these two areas. An overclaim is the portion of a district's claim for reimbursement that exceeds the federal financial assistance that is properly payable.

Using the breakfast and lunch reimbursement claim for September 2011, **Exhibit 9–5** demonstrates the value of September breakfast and lunch reimbursements for reviewed schools. TDA determines CRE overclaims based on the longevity and severity of the violation. The reclaim could be as little as the meals claimed during the review period, to funds claimed over multiple years. As of the time of this review, WISD had not submitted a breakfast in the classroom collection procedure to TDA for approval.

If the district does not gain control over the counting and claiming procedures used in the breakfast in the classrooms, as well as on cafeteria serving lines, the district risks substantial overclaims being established during the course of a CRE conducted by the TDA staff.

In order to improve the POS process, WISD should submit a revised breakfast in the classroom collection procedure to the Texas Department of Agriculture (TDA) for approval; and monitor all meal service to ensure that methods used in POS conform to the approved counting and claiming procedures. Some steps to achieve this goal include:

EXHIBIT 9–5
VALUE OF SEPTEMBER BREAKFAST AND LUNCH REIMBURSEMENTS FOR REVIEWED SCHOOLS
SEPTEMBER 2011

BREAKFAST								
SCHOOL	FREE	REIMBURSEMENT	REDUCED-PRICE	REIMBURSEMENT	FULL-PRICE	REIMBURSEMENT	TOTAL BREAKFAST REIMBURSEMENT BY SCHOOL	TOTAL BREAKFAST REIMBURSEMENT FOR THE REVIEWED SCHOOLS
Bell's Hill	7,048	$12,686.40	464	$696.00	187	$50.49	$13,432.89	
Crestview	7,998	$14,396.40	420	$630.00	699	$188.73	$15,215.13	
Dean Highland	3,940	$7,092.00	341	$511.50	265	$71.55	$7,675.05	
South Waco	12,371	$22,267.80	275	$412.50	430	$116.10	$22,796.40	$59,119.47
LUNCH								
SCHOOL	FREE	REIMBURSEMENT	REDUCED-PRICE	REIMBURSEMENT	FULL-PRICE	REIMBURSEMENT	TOTAL LUNCH REIMBURSEMENT BY SCHOOL	TOTAL LUNCH REIMBURSEMENT FOR THE REVIEWED SCHOOLS
Bell's Hill	7,259	$20,252.61	351	$838.89	86	$24.08	$21,115.58	
Crestview	7,263	$20,263.77	311	$743.29	320	$89.60	$21,096.66	
Dean Highland	7,460	$20,813.40	375	$896.25	396	$110.88	$21,820.53	
South	11,817	$32,969.43	211	$504.29	354	$99.12	$33,572.84	$97,605.61
Total Lunch and Breakfast Reimbursement for the Reviewed Schools								**$156,725.08**

SOURCE: WISD September 2011 Reimbursement Claim.

- Cease implementation of breakfast in the classroom in additional schools until the district has an approved collection procedure on file with the TDA;
- Train teachers on the counting procedures for breakfast in the classroom with emphasis on the individual student breakfast selections required to count a meal as reimbursable;
- Make provisions to ensure that substitute teachers who will be performing this duty have access to sufficient information to perform the task properly; and
- Re-establish the approved collection procedures described in attachment B of the policy statement for free and reduced-price meals for breakfasts and lunches served in cafeterias, or rewrite the procedures and submit to TDA for approval prior to implementation.

Following the review team's onsite visit, WISD reported that they have implemented a new barcode card system in 15 of the 19 elementary schools districtwide. This system requires all students to be individually identified at the POS to eliminate ID card issues.

This recommendation can be implemented using existing resources.

INCREASE BREAKFAST PARTICIPATION (REC. 34)

WISD does not fully realize the nutritional value to students and the revenue available as participation in the school breakfast program (SBP) is low at some campuses. Currently, the district operates a universal breakfast program districtwide. Universal school breakfast refers to any school program that offers breakfast at no charge to all students, regardless of income.

According to the Food Research and Action Center (FRAC), studies conclude that students who eat school breakfast may increase their mathematics and reading scores as well as improve their speed and memory in cognitive tests. Research also shows that children who eat breakfast at school, which is closer to class and test-taking time, may perform better on standardized tests than those who skip breakfast or eat breakfast at home. Evidence has grown that suggests that children who eat school breakfast are less likely to be

overweight and have improved nutrition. These children eat more fruits, drink more milk, and consume a wider variety of foods than those who do not eat breakfast or have breakfast at home. Many schools that provide universal breakfast in the classroom report decreases in discipline and psychological problems, visits to school nurses and tardiness, increases in student attentiveness and attendance, and generally improved learning environments.

Exhibit 9–6 shows the SBP's average daily participation percentage of students approved for free, reduced-price, and full-price meal benefits districtwide. For purposes of this exhibit, data was combined to show ADP participation at all the high school campuses, all the middle school campuses, and all elementary school campuses. In addition, this exhibit used the participation numbers for September 30, 2011.

As shown in **Exhibit 9–6,** the total ADP participation rates for all for all free, reduced-price, and full-price students is 35.4 percent at the high schools, 50.4 percent at the middle schools, and 62.7 percent at the elementary schools. All three of these percentages at each respective level are low for ADP in a universal breakfast program. Suggested participation goals for WISD might be 60 percent at the high schools, 70 percent at the middle schools, and 80 percent at the elementary schools.

WISD should develop strategies for increasing student participation in the school breakfast program. Some of these could include:

- Expand the practice of providing breakfast in the classroom. Currently, WISD has four elementary campuses that are piloting breakfast in the classroom programs. The average participation rate in the SBP for students in these four campuses is approximately 95 percent. This compares to a participation rate of 52 percent for students in all the other elementary schools. Is important to note that some of this increased participation may be in part due to counting errors in these four elementary schools. In addition, while breakfast in the classroom definitely increases participation, it also restricts food variety, and is labor intensive.
- Consider the potential for bringing students to the cafeteria in groups for a 15 minute nutrition break after the beginning of the school day but prior to 10:00 A.M. Delayed serving times, particularly in large schools is food and labor cost efficient and allows for increased variety and the sale of a la carte foods, if accommodations can be made within the limitations that influence instructional time. Not only is this an opportunity to increase participation in the SBP but also to sell a la carte foods that may be popular with students (as long as they conform to the Texas Public School Nutrition Policy).
- Consider providing a modified service, such as that used at Crestview Elementary. At this school all students report to the cafeteria when they arrive, and are actively encouraged to participate in the SBP. Students eat breakfast during the morning "den" meeting. Crestview is fortunate to have a dining room large enough to accommodate the entire student

EXHIBIT 9–6
WISD BREAKFAST PARTICIPATION
SEPTEMBER 30, 2011

	FREE			REDUCED-PRICE			FULL-PRICE			
	ADA ELIGIBLE	CURRENT ADP	ADP PERCENT-AGE	ADA ELIGIBLE	CURRENT ADP	ADP PERCEN-TAGE	ADA ELIGIBLE	CURRENT ADP	ADP PERCEN-TAGE	TOTAL ADP PERCENTAGE FOR ALL STUDENTS
High School	2,805	1,027	36.6%	270	90	33.3%	488	145	29.7%	35.4%
Middle School	2,669	1,388	52.0%	209	102	48.8%	243	82	33.7%	50.4%
Elementary School	6,892	4,572	66.3%	493	261	52.9%	729	254	34.8%	62.7%
TOTAL	**12,366**	**6,987**	**56.5%**	**972**	**453**	**46.6%**	**1,460**	**481**	**33%**	**53.5%**

NOTE: Percentages have been rounded to one decimal place.
SOURCE: WISD individual school monthly claim reports, September 30, 2011.

body. If a child arrives late, he may select a breakfast and take it to the classroom to eat it. Crestview is not serving breakfast in the classroom, yet they are serving breakfast to 88.7 percent of the children receiving free and reduced-price meal benefits. When successfully implemented, serving breakfast in the cafeteria instead of taking it to the classroom allows for increased variety in offerings, and requires fewer man hours to prepare and serve.

- Evaluate the potential for remote distribution stations which can increase breakfast participation in high schools as long as the point of service system can accommodate each location. Grab and go breakfasts provided near the entrance to the school or other locations where students congregate is used successfully by many school districts.

Exhibit 9–7 shows the potential increase in revenue if the high school SBP participation rate were increased to 60 percent.

If the high schools could increase participation in the SBP to 60 percent ADP, the increase in annual revenue would be $239,177 ($212,544 + $19,440 + $7,193= $239,177). The increase in costs would be $95,671 for a 40 percent food cost; $4,784 for a 2 percent non-food cost; and $21,854 in

EXHIBIT 9–7
INCREASED REVENUE DUE TO 60 PERCENT ADP FOR HIGH SCHOOL BREAKFAST PARTICIPATION
SEPTEMBER 30, 2011

			FREE		
	APPROVED	CURRENT ADP	60% ADP	INCREASE	VALUE OF INCREASE
Waco HS	**1056**	**428**	634	206	$371.00
University HS*	**1131**	**397**	679	282	$508.00
Waco Alternative	**49**	**12**	29	17	$31.00
Moore Academy	**569**	**190**	341	151	$272.00
	Per Day			656	$1,182.00
	Annual			118,080	$212,544.00
			REDUCED-PRICE		
	APPROVED	**CURRENT ADP**	**60% ADP**	**INCREASE**	**VALUE OF INCREASE**
Waco HS	**121**	**45**	73	28	$42.00
University HS*	**97**	**31**	58	27	$41.00
Waco Alternative	**0**	**0**	0	0	$0.00
Moore Academy	**52**	**14**	31	17	$26.00
				72	$109.00
				12,960	$19,440.00
			FULL-PRICE		
	APPROVED	**CURRENT ADP**	**60% ADP**	**INCREASE**	**VALUE OF INCREASE**
Waco HS	**271**	**87**	163	76	$21.00
University HS*	**152**	**42**	91	49	$13.00
Waco Alternative	**5**	**1**	3	2	$0.54
Moore Academy	**60**	**15**	36	21	$6.00
				148	$40.54
				26,640	$7,193.00

*The counts for September 30, 2011 were not typical for this school; counts for September 29, 2011 were used.
SOURCE: WISD September 2011 Record of Meals Claimed.

FSMC management and administrative fees (118,080 + 12,960 + 26,640 = 157,680 increase in meals served x $0.1386 per meal FSMC management and administrative fees =$21,854). It is unknown whether additional labor would be needed at the high schools. The total expenditures would then be $122,309 ($95,671 + $4,784 +$21,854 = $122,309). Total profit (total revenue minus total expenditures) to the school district for this effort would be $116,868 ($239,177 - $122,309).

Exhibit 9–8 shows the increase in revenue if the middle school SBP participation rate were increased to 70 percent.

If the middle schools could increase participation in the SBP to 70 percent ADP, the increase in annual revenue would be $171,542 ($155,844 + $12,150 + $3,548= $171,542). The increase in costs would be $68,617 for a 40 percent food cost; $3,431 for a 2 percent non-food cost; and a FSMC management and administrative fee of $14,944 (86,580 + 8,100 + 13,140 = 107,820 increase in meals served x $0.1386 per meal FSMC management and administrative fees = $14,944). It is unknown whether additional labor would be needed; however, middle schools may be staffed more like elementary schools than high schools. The total daily increase in meals is 593 (481+45+67=593) which equals a 106,740 increase in meals annually (593 x 180 days=106,740). When converting breakfasts to meal equivalents (ME) the factor of 0.66 is commonly used, yielding 70,448 additional ME. Using a conservative 15 MPLH the increased participation will yield 70,448 ME ÷15 MPLH= 4,697 additional labor hours x $10 per hour estimated wages and benefits = $46,970 additional labor cost. This would result in total expenditures of $133,962 ($68,617 + $3,431 + $14,944 + $46,970 = $133,962). Total profit (total revenue minus total expenditures) to the school district for this effort would be $37,580 ($171,542 - $133,962 = $37,580).

Exhibit 9–9 shows the increase in revenue if the elementary SBP participation rate were increased to 80 percent.

If the elementary schools could increase participation in the SBP to 80 percent ADP, the increase in annual revenue would be $470,016 ($412,452 + $41,040 + $16,524 = $470,016). The increase in costs would be $188,006 for a 40 percent food cost; $9,400 for a 2 percent non-food cost; and a FSMC administrative and management fee of $44,033 (229,140 + 27,360 + 61,200 = 317,700 increased meals x $0.1386 FSMC administrative and management fees = $44,033). The elementary schools reviewed appeared to be working at full capacity. The total daily increase in meals is 1765 (1273 + 152 + 340 = 1765) which equals a 317,700 increase in meals annually (1765 x 180 days = 317,700). When converting breakfasts to meal equivalents (ME) the factor of 0.66 is commonly used, yielding 209,682 additional ME. Using a conservative 15 meals per labor hour (MPLH) the increased participation will require $139,790 additional labor cost (209,682 ME ÷ 15 MPLH = 13,979 additional labor hours x $10.00 per hour estimated wages and benefits = $139,790 additional labor cost). The total expenditures would then be $382,530 ($188,006 + $9,400 + $44,033 + $139,790 = $381,229), leaving a total profit of $88,787 ($470,016 - $381,229 = $88,787).

If the district could increase high school participation in the breakfast program to 60 percent; middle school to 70 percent; and elementary school to 80 percent, then profits would increase by $243,549 annually ($116,868 + $37,580 + $88,787 = $243,235).

NUTRIENT STANDARD MENU PLANNING (NSMP) AND REIMBURSABLE MEALS (REC. 35)

WISD does not monitor to ensure that adequate nutrient analysis documentation is maintained to demonstrate that the district meals claimed for federal reimbursement met the requirements of the Nutrient Standard Menu Planning (NSMP) approach. The district was unable to provide requested nutrient analyses of the meals served and claimed for reimbursement during the course of the onsite review. The requested analyses (one week each, district choice, elementary, middle and high school) were provided via e-mail on November 18, 2011; however, at that point there was no opportunity to evaluate the provided analyses against the district recipe file and food production records. The district does not consistently document what was actually planned and served, in individual schools for each menu cycle, as required by regulations.

The USDA allows schools to select from five different methods for planning menus for the NSLP and SBP. Three of these methods are food-based, and two are nutrient-based. A large majority (75 percent) of districts across Texas use food-based systems. Under the food-based systems, the menus are planned using a pattern including meat/meat alternates (M/MA); vegetables/fruits (V/F); grains/breads (G/B); and milk, in specified weights and measures, by grade level. The documentation of the content of the meals served and claimed under the food-based menu planning systems are menus, recipes, and food production records. Meeting the

EXHIBIT 9–8
INCREASED REVENUE DUE TO 70 PERCENT ADP FOR MIDDLE SCHOOL BREAKFAST PARTICIPATION
SEPTEMBER 30, 2011

			FREE		
	APPROVED	ADP	70% ADP	INCREASE	VALUE OF INCREASE
Lake Air Intermediate	**551**	**350**	386	36	$65.00
Cesar Chavez Middle	**436**	**214**	305	91	$164.00
Tennyson Middle	**451**	**175**	316	141	$254.00
University Middle	**515**	**223**	361	138	$248.00
Carver Academy	**386**	**243**	270	27	$49.00
Brazos Middle	**330**	**183**	231	48	$86.00
	Per Day			481	$866.00
	Annual			86,580	$155,844.00
			REDUCED-PRICE		
	APPROVED	ADP	70% ADP	INCREASE	VALUE OF INCREASE
Lake Air Intermediate	**63**	**37**	44	7	$11.00
Cesar Chavez Middle	**21**	**11**	15	4	$6.00
Tennyson Middle	**49**	**21**	34	13	$20.00
University Middle	**44**	**15**	31	16	$24.00
Carver Academy	**27**	**15**	19	4	$6.00
Brazos Middle	**5**	**3**	4	1	$2.00
	Per Day			45	$69.00
	Annual			8,100	$12,150.00
			FULL-PRICE		
	APPROVED	ADP	70% ADP	INCREASE	VALUE OF INCREASE
Lake Air Intermediate	**86**	**32**	60	26	$7.00
Cesar Chavez Middle	**11**	**2**	8	3	$1.00
Tennyson Middle	**76**	**12**	53	23	$6.00
University Middle	**24**	**11**	17	7	$2.00
Carver Academy	**33**	**21**	23	10	$3.00
Brazos Middle	**13**	**4**	9	4	$1.00
	Per day			73	$20.00
	Annual			13,140	$3,548.00

SOURCE: WISD September 2011 Record of Meals Claimed.

EXHIBIT 9–9
INCREASED REVENUE DUE TO 80 PERCENT ADP FOR ELEMENTARY SCHOOL BREAKFAST PARTICIPATION
SEPTEMBER 30, 2011

			FREE		
	APPROVED	ADP	80% ADP	INCREASE	VALUE OF INCREASE
Alta Vista Montessori*	**341**	**309**	NA	0	$0.00
Bell's Hill*	**396**	**370**	NA	0	$0.00
Brook Avenue	**364**	**236**	291	55	$99.00
Cedar Ridge	**468**	**254**	374	120	$216.00
Crestview	**405**	**367**	NA	0	$0.00
Dean-Highland	**392**	**225**	314	89	$160.00
Hillcrest Professional	**166**	**66**	133	67	$121.00
J H Hines	**518**	**345**	414	69	$124.00
Kendrick	**412**	**127**	330	203	$365.00
Meadowbrook	**240**	**140**	192	52	$94.00
Mountainview	**274**	**125**	219	94	$169.00
North Waco*	**433**	**425**	NA	0	$0.00
Parkdale	**349**	**213**	279	66	$119.00
Provident Heights	**375**	**251**	300	49	$88.00
Sul Ross	**373**	**217**	298	81	$146.00
Viking Hills	**154**	**68**	123	55	$99.00
Lake Waco Montessori	**269**	**107**	215	108	$194.00
West Avenue	**334**	**102**	267	165	$297.00
South Waco*	**629**	**625**	NA	0	$0.00
	Per Day			1273	$2,291.00
	Annual			229,140	$412,452.00

			REDUCED-PRICE		
	APPROVED	ADP	80% ADP	INCREASE	VALUE OF INCREASE
Alta Vista Montessori*	**49**	**41**	NA	0	$0.00
Bell's Hill*	**24**	**24**	NA	0	$0.00
Brook Avenue	**7**	**5**	6	1	$2.00
Cedar Ridge	**39**	**18**	31	13	$20.00
Crestview	**21**	**21**	NA	0	$0.00
Dean-Highland	**31**	**16**	25	9	$14.00
Hillcrest Professional	**36**	**9**	29	20	$30.00
J H Hines	**8**	**6**	6	0	$0.00
Kendrick	**51**	**14**	41	27	$41.00
Meadowbrook	**12**	**8**	10	2	$3.00
Mountainview	**27**	**9**	22	13	$20.00

2,EXHIBIT 9–9 (CONTINUED)
INCREASED REVENUE DUE TO 80 PERCENT ADP FOR ELEMENTARY SCHOOL BREAKFAST PARTICIPATION
SEPTEMBER 30, 2011

	REDUCED-PRICE				
	APPROVED	ADP	80% ADP	INCREASE	VALUE OF INCREASE
North Waco*	19	18	15	0	$0.00
Parkdale	43	20	34	14	$21.00
Provident Heights	17	9	14	5	$8.00
Sul Ross	11	5	9	4	$6.00
Viking Hills	26	9	21	12	$18.00
Lake Waco Montessori	46	12	37	25	$38.00
West Avenue	10	1	8	7	$12.00
South Waco*	16	16	NA	0	$0.00
	Per Day			152	$228.00
	Annual			27,360	$41,040.00

	FULL-PRICE				
	APPROVED	ADP	80% ADP	INCREASE	VALUE OF INCREASE
Alta Vista Montessori*	46	45	NA	0	$0.00
Bell's Hill*	16	7	13	6	$2.00
Brook Avenue	10	3	8	5	$1.00
Cedar Ridge	30	18	24	6	$2.00
Crestview	39	32	NA	0	$0.00
Dean-Highland	28	11	22	11	$3.00
Hillcrest Professional	112	22	90	68	$18.00
J H Hines	27	9	22	13	$4.00
Kendrick	12	1	10	9	$2.00
Meadowbrook	15	6	12	6	$1.00
Mountainview	136	19	109	90	$24.00
North Waco*	14	10	11	1	$0.27
Parkdale	44	20	35	15	$4.00
Provident Heights	3	1	2	1	$0.27
Sul Ross	7	2	6	4	$1.00
Viking Hills	33	4	26	22	$6.00
Lake Waco Montessori	121	26	97	71	$19.00
West Avenue	12	1	10	9	$2.00
South Waco*	24	16	19	3	$1.00
	Per Day			340	$91.80
	Annual			61,200	$16,524.00

*Breakfast in the classroom pilots.
SOURCE: September 2011 Record of Meals Claimed.

district's monitoring responsibility of food-based menus is relatively easy.

WISD has elected to use the NSMP, a method based on meeting a set of standards identifying eight key nutrients, in their targeted amounts, by the week. NSMP is a computer-based menu planning system that uses approved computer software to analyze the specific nutrient content of menu items automatically while menus are being planned. It is designed to assist menu planners in choosing food items that create nutritious meals while meeting the nutrient standards. Under this method, a nutrient analysis is based on district standardized and analyzed recipes, the nutrients contained in purchased-prepared products as reported by the manufacturers, and individual school food production records. The nutrient analysis, not compliance with a meal pattern, is the documentation that the meals served and claimed met requirements.

It is the district's responsibility to determine that the meals served and claimed meet federal requirements. In order to truly monitor and test the system, an evaluation of the nutrient information for each specific recipe used (as stated on the food production record) and specific purchased-prepared product (as identified by a label in stock or on an invoice) must be performed on a sample of randomly selected menus. This is a long and complex but necessary process to identify if the analysis is accurate. The wrong recipe (the district has several different recipes for some of the products they prepare) or the wrong manufacturer's code on a purchased-prepared product can make the analysis appear to meet nutrient requirements when it actually does not.

All schools using the NSMP approach must provide the analysis based on weighted averages. This means the menu analysis must be adjusted for each school, for each cycle, based on the food production record from the last time the menu was served in that school. **Exhibit 9–10** and **Exhibit 9–11** show the USDA required nutrients of the NSMP Breakfast and Lunch, respectively.

It must be noted that the USDA protocol identified for completing the nutrient analysis of meals served is complex and takes time to understand. A full description of the requirements of this process may be found at: *http://www.fns.usda.gov/tn/resources/nutrientanalysis.html*.

Prior to serving the menu on an upcoming cycle, the district did not adjust menus for each school with the number of servings actually selected by students the last time the menu was served. The district is using a new menu for this school year but has completed the cycle more than once.

WISD should monitor Child Nutrition Program operations to ensure that current and accurate nutrient analysis of all meals, by school and menu cycle, meet the federal requirements for reimbursable meals served under the Nutrient Standard Menu Planning approach. Because nutrient analyses using weighted averages are the documentation required to support the claim for reimbursement, reimbursement funds could be in jeopardy if the district does not maintain current and accurate nutrient analysis of all meals, by school and cycle. The district may elect to change their system of menu planning to a food-based system (with the approval of the FSMC), which may be considerably easier for a district employee to monitor. If the district elects to make such a change, it should amend the WISD policy statement on file with the TDA.

This recommendation can be implemented with existing resources.

USE OF STANDARDIZED RECIPES AND FOOD PRODUCTION RECORDS (REC. 36)

WISD does not monitor to ensure that school personnel are following standardized recipes; therefore, food production records which list amount prepared in multiples of a recipe do not actually document the content of the menu items prepared, served, and claimed for reimbursement. All meals claimed for reimbursement must be supported by an accurate food production record and the district's assurance that standardized recipes are followed, without fail.

One example of the recipe not being followed was observed during a site visit at Crestview Elementary School at lunch. The menu item as served appeared to be some type of nachos without the cheese sauce; it was tortilla chips on the plate, topped with cooked ground meat. Upon further investigation, it was determined that the menu item was taco salad. After pulling the recipe, the following was found:

- The number of chips on the plate was prescribed by the recipe as 18, but was served as approximately ten.
- The meat called for in the recipe was a #20 scoop; however, the school had no #20 scoop.
- The vegetable portion of the menu item required lettuce and diced tomatoes; no diced tomatoes were ordered due to price; a ¼ cup of lettuce was offered as a side in a tray insert.

EXHIBIT 9–10
MINIMUM NUTRIENT AND CALORIE LEVELS FOR SCHOOL BREAKFASTS

NUTRIENT STANDARD MENU PLANNING APPROACHES (SCHOOL WEEK AVERAGES)

	MINIMUM REQUIREMENTS		
NUTRIENTS AND ENERGY ALLOWANCES	**PRE-SCHOOL**	**GRADES K–6**	**GRADES 7–12**
Energy allowances (calories)	388	554	618
Total fat* (as a percentage of actual total food energy)	1	1	1
Saturated fat ** (as a percentage of actual total food energy)	2	2	2
RDA for protein (g)	5	10	12
RDA for calcium (mg)	200	257	300
RDA for iron (mg)	2.5	3.0	3.4
RDA for Vitamin A (RE)	113	197	225
RDA for Vitamin C (mg)	11	13	14

*Total fat not to exceed 30 percent of calories over a school week.
**Saturated fat not to exceed 10 percent of calories over a school week.
SOURCE: USDA Program Aid, Menu Planner for Healthy School Meals, FNS-303, Rev. 2008.

EXHIBIT 9–11
MINIMUM NUTRIENT AND CALORIE LEVELS FOR SCHOOL LUNCHES

NUTRIENT STANDARD MENU PLANNING APPROACHES (SCHOOL WEEK AVERAGES)

	MINIMUM REQUIREMENTS			OPTIONAL
NUTRIENTS AND ENERGY ALLOWANCES	**PRE-SCHOOL**	**GRADES K–6**	**GRADES 7–12**	**GRADES K–3**
Energy allowances (calories)	517	664	825	633
Total fat* (as a percentage of actual total food energy)	1	1	1	1
Saturated fat (as a percentage of actual total food energy)	2	2	2	2
RDA for protein (g)	7	10	16	9
RDA for calcium (mg)	267	286	400	267
RDA for iron (mg)	3.3	3.5	4.5	3.3
RDA for Vitamin A (RE)	150	224	300	200
RDA for Vitamin C (mg)	14	15	18	15

*Total fat not to exceed 30 percent of calories over a school week.
**Saturated fat not to exceed 10 percent of calories over a school week.
SOURCE: USDA Program Aid, Menu Planner for Healthy School Meals, FNS-303, Rev. 2008.

- The recipe called for cheese, but no cheese was available for selection.

The district does not monitor if the actual food production is accurately portrayed on the food production record. Although a multiple number of recipes (i.e., 3 x recipe) is sufficient documentation for TDA, it is only when the district can ensure that a recipe is followed for every preparation, and the actual food prepared is recorded accurately on the food production record that monitoring can occur. Currently, the district cannot monitor whether or not meals claimed for reimbursement meet requirements unless they observe the preparation and service of the meal.

In order for the NSMP system to work, each preparation must have a written, standardized recipe. The recipe must be strictly followed by the cook. If the district does not ensure that standardized recipes are followed for every preparation,

documentation of the meals served and claimed will be invalid and the district's reimbursement funds may be in jeopardy.

WISD should monitor kitchen operations to ensure that accurate food production records are maintained and that district standardized recipes are followed for every preparation. These records are the only kitchen documentation that the meals served and claimed for reimbursement meet requirements. This requires that district standardized recipes be followed for every preparation.

This recommendation can be implemented with existing resources.

OFFER VERSUS SERVE PROVISION (REC. 37)

WISD does not monitor to ensure that the Offer versus Serve (OVS) provision in the service of breakfast or lunch has been properly implemented. OVS is a provision that allows students to decline either one or two of the menu items in a school lunch (or one menu item in a school breakfast) that they do not intend to eat. The intent of this provision is to reduce waste by permitting students to select only the foods they want to consume.

During the school review onsite visit the following situations were observed:

- Teachers, food service staff, and students were unaware of whether or not components of the breakfast in the classroom could be refused;
- Food service staff on the cafeteria serving lines could not identify the components of the unit-priced meal, and were not confident as to which components could be taken or refused;
- Students in special needs and preschool classes did not have access to all of the offerings of the school lunch, but instead the teachers made the decision as to what all of the children in their class were served; and
- A child left the serving line with less than the required components of a reimbursable lunch at Bells Hill Elementary School.

Food service staff members as well as any other school employee responsible for determining if a meal is reimbursable must understand the OVS provision or the district risks losing reimbursement. All components of the unit-priced meal must be available for selection by all students; teachers cannot make these selections for students. Under OVS, students must not be required to take all components of the meal. One teacher stated "I make the students take everything, and they can throw it away if they don't eat it."

While OVS is not required at breakfast and is only required at lunch at the high school level, according to the food service director, WISD has chosen to implement OVS at both breakfast and lunch in all grade levels throughout the district. With this decision in place, it is WISD's responsibility to operate the OVS system effectively. However, if the district continues to operate the programs with an improperly implemented OVS provision, the nutrient analysis for those menus will continue to be invalid, and meals will not be reimbursable. Based on September 2011 data, the selections made for the special needs and preschool classes caused 128 meals to be non-reimbursable in that school on the day of review. **Exhibit 9–12** demonstrates the annual reimbursement value of 128 lunches daily at South Waco Elementary School.

As a result, WISD should monitor Child Nutrition Program operations to ensure that all food service staff members are trained on the proper implementation of Offer versus Serve; and that the provision is properly implemented in all schools for breakfast and lunch. Properly implemented OVS reduces

EXHIBIT 9–12
ANNUAL REIMBURSEMENT FOR 128 LUNCHES AT SOUTH WACO ELEMENTARY
SEPTEMBER 2011

	FREE	REDUCED-PRICE	FULL-PRICE	TOTAL
Percentage of September claims	95.4%	1.7%	2.9%	
Number of meals not reimbursable	122	2	4	
Reimbursement Rate	$2.79	$2.39	$0.28	
Daily Reimbursement	$340.82	$5.21	$1.02	$347.05
Annual Reimbursement				$62,469

SOURCE: September 2011 lunch reimbursement claim for South Waco Elementary School and USDA reimbursement rates for 2011.

waste and saves money. Efforts to encourage students to refuse foods that they don't intend to eat removes valuable district dollars from the garbage can. Steps to accomplish this could include:

- Prominently display in the serving area informational materials describing the components of a unit-priced meal and required student selections to claim the meal as reimbursable. There was one such poster at the doorway of the serving area of Crestview Elementary School, but clearly staff members had not read or understood it. The poster was placed too high on the door for students to read it.
- Make OVS requirements known to administrators and teachers, or any other staff members who may be determining the food selections of children.
- Require food service managers to report to central food service any situations where students are being required to take foods that they do not intend to eat.

This recommendation can be implemented with existing resources.

PLATE WASTE (REC. 38)

There was excessive tray waste for breakfast and lunch at all of the visited elementary schools; and moderate plate waste at lunch during visits to the Brazos Middle and Waco High Schools. Several factors contribute to the waste, including serving breakfast in bags; handling of leftover foods; menu variety; and portion sizes.

BREAKFASTS IN BAGS

Breakfasts in the classroom foods are prepackaged in white lunch bags, with cold foods being delivered in coolers. Placing the food items in bags is labor intensive and does not allow students to refuse foods. At the end of meal service at Bells Hill Elementary School, the discard in the garbage bag from a kindergarten class was evaluated. The class included 19 students. No food that had been tasted was counted as waste.

Whole portions of the following foods were counted:

- 2 Kolaches @ $0.2885 = $0.58
- 9 Milk @ $0.284 = $2.56
- 6 Apples @ $0.10= $0.60

The value of the uneaten full portions of food (.58 + $2.56 + $.10 = $3.74) equaled $673.20 annually ($3.74 per day x 180 days = $673.20) for just one classroom. The principal suggested that one cause of waste in the lower grades is that the students are served a whole fresh fruit at breakfast daily; during the week of the review, the breakfast menu included one apple, three pears, and one orange. It was suggested that canned fruit and juices be served in addition to the fresh fruit, and when fresh fruit is served, it be cut at least for the younger children.

Crestview Elementary is serving breakfast in the cafeteria but still placing the hot or room temperature foods in a white lunch bag, so the child has no opportunity to refuse food items they do not intend to eat. The first five discarded bags randomly pulled from the garbage can in the dining room contained full portions of each of the food items served. There is no clear explanation for this occurrence in that students are not required to take breakfast.

HANDLING OF LEFTOVER FOODS

There is no food service policy for what teachers should do with unselected foods leftover from breakfast in the classroom. Milk is opened and poured into the sink in one classroom, another leaves it in the cooler to be returned to the kitchen, and a third threw it away in the garbage bag. Kitchen staff is basically recycling any milk that is returned; however, there is no written direction as to how this should be done. At South Elementary on the day of the review, there was leftover milk sitting out at room temperature in the kitchen at 10:00 AM.

In coordination with the local health authority, the food service department should develop written procedures describing how unselected foods should be returned, and what should be done with individual food items when they reach the kitchen. Each of the four pilot schools may be losing $10,080 annually (50 units of milk per day x 180 days = $10,080).

MENU VARIETY AND CHOICES

On the day of the review of Bells Hill Elementary the children had fresh apples for breakfast, lunch, and the afterschool snack. The three hot entrees offered for lunch were chicken sandwich, chicken fajita, and chicken quesadillas, and one of the salads had turkey as the protein source. The entrees were all poultry, and all brown; it was an unattractive food display. Menus indicated basically the same cold fruit and vegetable offerings every day. Lack of variety within the choices, unattractive foods, and over use of particular menu items all contribute to plate waste.

The four or five entrée choices offered at the elementary level may be unnecessary. Some of the preparations are for quantities of less than 20 servings, which may not be the best use of labor hours. Some of these items are only selected by teachers such as chicken wraps (Bells Hill makes five and sells one, the other four are disposed of). South Waco Elementary was offering pasta on the day of the visit. They prepare 33 servings and normally serve five, throwing away 28 servings.

PORTION SIZES

The portion sizes for fruits and vegetables in the elementary schools are exceptionally large, and may contribute significantly to the food discarded by students. On the day of the visit to South Waco Elementary all fruits and vegetables were served in one-half cup portions. On the nutrient analysis provided by the district for elementary schools, November 4, 2011, some of the portion sizes listed are as follows:

- Turkey and gravy – 3/4 cup
- Brown rice – 3/4 cup
- Carrots Herb Roasted – 1/2 cup
- Carrots Fresh, Raw Sticks – 3/4 cup (according to the Food Buying Guide for Child Nutrition Programs 3/4 cup of raw carrot sticks would equal nine ½-inch x 4-inch sticks)
- Broccoli, Fresh, Raw – 3/4 cup
- Fruit Mix and Syrup – 3/4 cup

The high school menus as shown on the nutrient analysis for the same day indicate:

- Sweet Corn – 3/4 cup
- Mashed Potatoes – 3/4 cup
- Spanish Rice – 3/4 cup
- Refried Beans – 3/4 cup

Portions this large are typically not served in high schools or elementary schools.

Large portions may be overwhelming to students in all grade levels, particularly those in grades K–3. If the nutrient analysis will allow, reducing these portions to one-fourth cup except for menu items that are popular with students will reduce the waste and cost of fruits and vegetables for grades K-3 by at least 50 percent, or 66 percent using the information provided in the nutrient analysis (whichever is correct). Students in grades 4 and up in the elementary schools might receive three-eighths cup per serving. Decisions on actual portion sizes offered can be made after a plate waste study is conducted by the food service department.

Exhibits 9–13 and **9–14** shows the nutrient analysis summary as provided by the district, for the menus served to elementary and high school students on November 4, 2011, respectively. The last column of the chart shows the percentage of the targeted nutrient delivered by this meal. These percentages reflect the potential for reducing the portion sizes of fruits and vegetables at all grade levels, as well as the portion sizes of other offerings.

In order to reduce food costs, WISD should monitor CNP operations to ensure that plate waste studies are conducted and strategies are developed for reducing the amount of food students are discarding. Strategies might include some of the following:

- Offer a variety of foods to select from in schools where the breakfast is served in the cafeteria. Allow students to select and carry food to a table or the classroom using a tray or a bag (whichever is less expensive).
- Develop a system for sending less than one of each menu item per child, based on usage; with provisions for the kitchen to "hot shot" additional needed portions when serving breakfast in the classroom.
- Properly implement OVS for breakfast and lunch throughout the district at all grade levels.
- Offer a variety of menu items at breakfast and lunch, with new side items being introduced to create interest.
- Reduce portion sizes of less popular foods, particularly in the K–3 grade levels, whenever possible.
- Reposition or remove from the menu less popular items such as pasta casserole, and chicken wraps.

Using a conservative estimate, if steps such as these are implemented, WISD could save at least 5 percent of food cost, or $191,916 annually ($3,838,323 x 5 percent = $191,916).

USE OF DISPOSABLES (REC. 39)

Higher cost disposable service ware is being used in cafeterias. For example, the district currently packs its breakfast in the classroom into white lunch bags that are provided to every

EXHIBIT 9–13
NUTRIENT ANALYSIS SUMMARY OF ELEMENTARY SCHOOL MENU
NOVEMBER 4, 2011

NUTRIENT	MENU AVERAGE	% OF CALORIES	TARGET	% OF TARGET
Calories	647		645	100%
Cholesterol (mg)	55			
Sodium (mg)	1615			
Fiber (g)	8.93			
Iron (mg)	3.47		3.30	105%
Calcium (mg)	482.7		267.00	181%
Vitamin A (IU)	6063		1055	575%
Vitamin A (RE)	975		211	462%
Vitamin C (mg)	106.54		15.00	710%
Protein (g)	37.06	22.90%	8.87	418%
Carbohydrate (g)	97.99	60.55%		
Total Fat (g)	13.10	18.22%	<30.00%	
Saturated Fat (g)	3.99	5.54%	<10.00%	
Trans Fat (g)	0.11	0.15%		

SOURCE: WISD nutrient analysis for the menu served November 4, 2011.

EXHIBIT 9–14
NUTRIENT ANALYSIS SUMMARY OF HIGH SCHOOL MENU
NOVEMBER 4, 2011

NUTRIENT	MENU AVERAGE	% OF CALORIES	TARGET	% OF TARGET
Calories	823		645	100%
Cholesterol (mg)	52			
Sodium (mg)	1944			
Fiber (g)	9.12			
Iron (mg)	4.65		4.50	103%
Calcium (mg)	493.5		400	123%
Vitamin A (IU)	4629		1500	309%
Vitamin A (RE)	723		300	241%
Vitamin C (mg)	27.22		18.11	150%
Protein (g)	33.09	16.09%	16.06	206%
Carbohydrate (g)	115.04	55.94%		
Total Fat (g)	25.79	28.21%	<=30.0%	
Saturated Fat (g)	6.51	7.12%	<10.0%	
Trans Fat (g)	.19	0.2%		

SOURCE: WISD nutrient analysis for the menu served November 4, 2011.

student and it portions canned fruit into plastic four-ounce cups with lids.

The district should evaluate the cost of the disposable service ware used to determine potentially less expensive alternatives. Regarding just the previous two examples, if the district stopped packing the white lunch bags but instead simply sent the product in bulk to students served breakfast in the classroom, the four schools providing this service would save 1,906 bags daily costing $13,723 annually ($0.04 per bag = $76.24 per day x 180 days = $13,723).

In addition, WISD should consider using plastic tray inserts instead of portioning canned fruit into the plastic four-ounce cups. The tray insert costs an estimated 0.008 per unit, the four-ounce plastic cup costs $0.014 and the lid costs $0.017. The district is serving 12,070 lunches per day, based on its September 2011 claim. The difference in cost between a tray insert and a plastic cup and lid is $0.023. If a tray insert were substituted for a plastic cup and lid on one portion on 50 percent of the lunches served, the savings is $24,985 annually (0.5 percent x 12,070 meals per day = 6035 meals x 0.023 cost per cup and lid = 138.805 x 180 days =$24,985 annually). The cups are used at both breakfast and lunch, but not necessarily every day.

If the two above changes were made, a cost savings of $38,708 ($13,723 + $24,985 = $38,708) could be realized.

STUDENT AND ADULT MEAL PRICING (REC. 40)

The student and adult full-price lunch prices do not cover the cost of producing and serving the meals. Student and adult full-price lunch prices are less than the federal reimbursement for a free meal. WISD has increased student and adult meal pricing for school year 2011–12; however, the adult lunch price is less than the federal reimbursement plus USDA commodity assistance for a free student lunch.

Exhibit 9–15 identifies school year 2011–12 student and adult meal prices for school districts in the surrounding area. Of the eleven districts surveyed, WISD is one of two districts that provide a universal breakfast for all students. WISD has a lower price for student and adult lunches than eight of the surveyed districts.

Exhibit 9–16 shows that the adult lunch price is $0.26 less than the reimbursement on a student free lunch. Districts must ensure, to the extent practicable, that the federal reimbursements, children's payments, and other non-designated nonprofit child nutrition revenues do not subsidize program meals served to adults. Lunches served to adults must be priced so that the adult payment in combination with any other revenues (i.e., school subsidizing as a fringe benefit) is sufficient to cover the overall cost of the meal, including the value of any USDA entitlement and bonus commodities used to prepare the meal.

Currently, WISD loses money on each full-price lunch served. As a result, WISD should raise adult and student full-price lunch prices to ensure that the revenue generated is sufficient to cover the cost of preparing and serving the meals.

In order for WISD full-price student and adult lunch prices to equal the reimbursement for a free meal, the student lunch price would need to be raised to $2.51; and the adult lunch price to $3.01. Students receiving full-price meal benefits would receive breakfast and lunch for $2.51 daily. Districts typically review the meal prices annually after USDA releases the reimbursement rates. Small price increases made annually are less difficult to present to parents than large increases introduced less often.

Exhibit 9–17 shows the potential daily and annual (180 days) increase in revenue if prices are increased to the level of a reimbursable free breakfast and free lunch.

This potential increase in revenue, if the above changes are made, would equal an annual revenue increase of $68,162 ($378.68 daily increase x 180 days = $68,162).

BRANDED PRODUCTS (REC. 41)

The use of branded products for sale in the Waco High School reduces the profits and the value provided students through the CNP. These branded products are foods from local businesses that are sold daily in the high schools at WISD. WISD has entered into contractual agreements with these companies to sell these products. However, the contracts can be voided at anytime.

Exhibit 9–18 is a summary of the service of branded products in the Waco High School from August through October 2011, adapted from information provided by the food service operations manager. The companies supplying the branded products have set minimums that they will deliver, so that the kitchen manager cannot order based on need. Also, the kitchen contractually cannot re-use any of the unsold products; any leftover items must be discarded at the end of the day. On the day of the review team's onsite visit to the district, the kitchen discarded $205 worth of products.

EXHIBIT 9–15
SCHOOL MEAL PRICES FOR WISD AND SURROUNDING AREA DISTRICTS
2011–12

	BREAKFAST				LUNCH			
	ELEMENTARY SCHOOL	HIGH SCHOOL	ADULT	VISITOR	ELEMENTARY SCHOOL	HIGH SCHOOL	ADULT	VISITOR
Waco	**Free**	**Free**	**$2.00**	**$2.00**	**$1.90**	**$2.15**	**$2.75**	**$2.75**
Bosqueville	$1.50	$1.50	$2.00	$2.00	$1.90	$2.15	$3.00	$3.00
China Springs	$1.00	$1.00	$1.50	$1.50	$2.00	$2.25	$2.75	$2.75
Connally	Free	$1.10	$1.75	$1.75	$2.15	$2.40	$3.00	$3.00
Crawford	$1.25	$1.25	$1.75	$1.75	$2.00	$2.25	$2.50	$2.50
Gholson	$1.25	$1.25	$1.75	$1.75	$2.10	$2.10	$3.00	$3.00
Mart	Free	Free	$1.75	$1.75	$2.25	$2.50	$3.25	$3.25
Moody	$1.50	$1.50	$2.00	$2.00	$2.00	$2.25	$3.50	$3.50
McGregor	$1.25 K-4	$1.25 5-12	$1.50	$1.50	$2.00 K-4	$2.25 5-12	$3.00	$3.00
Midway	$0.95	$0.95	$1.40	$1.40	$1.85	$2.50	$2.80	$2.80
West	$1.25	$1.50	$2.00	$2.00	$2.25	$2.25	$3.00	$3.00

SOURCE: School district websites and e-mails to districts.

EXHIBIT 9–16
WISD STUDENT AND ADULT LUNCH PRICES COMPARED TO TOTAL REVENUE GENERATED BY A FREE STUDENT LUNCH
2011–12

CATEGORY OF MEAL BENEFITS	PRICE PAID	REIMB	60 PERCENT	USDA FOODS VALUE	TOTAL PER MEAL REVENUE	DIFF BETWEEN FREE STUDENT AND ADULT PAID
Free	$0.00	$2.77	$0.02	0.2225	$3.01	$0.00
Reduced-Price	$0.40	$2.37	$0.02	0.2225	$3.01	$0.00
Full-Price Elementary/Middle	$1.90	$0.26	$0.02	0.2225	$2.40	($0.61)
Full-Price Secondary	$2.15	$0.26	$0.02	0.2225	$2.65	($0.36)
Adult	$2.75	$0.00	$0.00	N/A	$2.75	($0.26)

SOURCE: Current district meal prices and United States Department of Agriculture (USDA) reimbursement rates 2011–12.

Industry standards for food cost (not including USDA foods) range from 40 to 45 percent as a percentage of revenue. The district food cost on these particular products is 89.5 percent, leaving 11.5 percent to cover the cost of labor, non-food items, and profit. The district provides approximately seven and one half hours at an estimated $10 per hour (wage and benefits) or $75 worth of labor per day; times 49 days in the period equals an additional cost to the programs of $3,675. A conservative estimate of non-food expenses of two percent of revenue equals $676 in additional costs. Adding $30,257 food cost + $3,675 labor cost + $676 non-food cost = $34,608 total cost, $786 less than revenue or a $16.04 daily loss. The loss of $16.04 daily times 180 days equals an annual loss of $2,888. The only entities deriving any profit from these transactions are the businesses supplying the products; however, this is not where the loss of revenue ends.

During the period identified in **Exhibit 9–18,** the district served 12,469 meals to those students who purchased from the branded line. These are lunches that could instead have been purchased as reimbursable meals through the normal cafeteria line. While it is not possible to determine how many of these meals would be purchased through the normal cafeteria line or at what reimbursable rate, it is fair to assume that some portion would. As a result, the district should see increased revenue if the branded products were not offered.

EXHIBIT 9–17
WISD REVENUE GENERATED USING CURRENT ADP AND INCREASED PRICING
NOVEMBER 5, 2011

	LUNCH			
SCHOOL	DAILY FULL- PRICE ADP	DIFFERENCE IN REVENUE PER MEAL	POTENTIAL DAILY INCREASE IN REVENUE	POTENTIAL ANNUAL INCREASE IN REVENUE
Student Elementary/Middle	380	$0.61	$231.80	
Student High School	408	$0.36	$146.88	
Adult	unknown	$0.26	unknown	
TOTAL			**$378.68**	**$68,162.40**

SOURCE: WISD Monthly Record of Meals Claimed, October 2011.

EXHIBIT 9–18
BRANDED PRODUCTS PURCHASED AND SOLD
AUGUST TO OCTOBER 2011

PRODUCT	PORTIONS DELIVERED	PORTION COST	FOOD COST	PORTIONS SOLD	SELLING PRICE	TOTAL SALES
Pizza	4,704	$1.02	$4,798	4,159	$1.75	$7,278
Pizza Roll	288	$0.75	$216	265	$1.50	$398
Chicken Sandwich	4,045	$2.65	$10,719	3,390	$3.25	$11,018
Burrito	4,890	$2.97	$14,523	4,655	$3.25	$15,129
TOTAL			**$30,257***			**$33,822***

*Total Numbers have been rounded to the nearest dollar.
SOURCE: Adapted from information provided by WISD food service operations manager, November 5, 2011.

Additionally, service would be improved for students receiving free and reduced-price meals in that the current branded serving lines would be converted to in-house brands and would be open to all students, whereas currently they are strictly cash lines.

WISD should remove branded products from the Waco High School menu and substitute in-house brands, or other reimbursable offerings on those serving lines. As stated earlier, this can be accomplished by immediately voiding all of the existing contracts with the local companies providing these branded products.

The potential increase in savings for the district if the above changes are made would result in an annual savings of $2,888 ($16.04 daily x 180 days = $2,888). Any further fiscal impact is not assumed in this recommendation. However, once the district determines which actions to pursue, additional savings should be considered in the implementation. For example, using a conservative estimate, if one-third or 4,115 of the 12,469 currently purchased meals through the branded food lines were instead purchased as full-price meals through the cafeteria, the district has the potential to increase their revenue by $7,598 annually. This is calculated by 4,115 meals/49 days = 84 meals a day x $.5025 reimbursement rate ($0.28 federal reimbursement + $0.2225 USDA food) = $42.21 daily x 180 days= $7,598.

TEMPORARY SUPPORT STAFF (REC. 42)

WISD routinely uses employees from a temporary agency to staff kitchens which increases the per hour cost of that labor by an estimated 25 percent. This practice is unsatisfactory to the food service management team not only due to the cost, but more importantly because it increases the amount of time it takes to put a substitute in place. Instead of calling a substitute directly, the agency must be contacted first, after they open in the morning. By the time the employee arrives at the job, the morning food production may be complete.

Currently, the food service management team does not have access to the applications for food service employment. The hiring process is conducted entirely by Human Resources, except for the selection of management trainees. School food service departments often build their substitute pool from applicants for food service positions in the district. This procedure allows the department to observe the work of

potential employees prior to hiring. Without access to the applications, this practice is not possible, thus the temporary agency is necessary.

WISD should allow the food service management team to develop a pool of substitute employees from which to draw to eliminate the added costs of using an agency. This will involve giving the food service management team access to the file of applications for potential food service employees so they may begin to build a pool of substitutes that managers may call directly. The director and his management staff indicated that they are eager to support the kitchen managers in hiring food service employees directly from within the department.

The manager of operations estimated that in the district there are approximately 14 substitute employees working six hours each day. The use of these substitutes costs the district an estimated additional $2.50 per hour. Savings of $37,800 per year could be achieved from the recommended approach. (14 employees per day x 6 hours = 84 hours per day x $2.50 per hour = $210 per day x 180 days = $37,800 annual fee for the agency service of providing temporary employees).

Since the time of the review, WISD has instituted a policy to allow the food service manager to begin creating an internal WISD temporary staffing pool.

FOOD COSTS (REC. 43)

WISD does not independently research the prices paid for food including rebates and credits as compared to those paid by other districts in the surrounding area who are participating in the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative. The district does not consolidate and reconcile individual school invoices from food distributors to validate the monthly direct food costs charged by the food service management company (FSMC). WISD receives rebates and other credits but does not know how they are earned.

Last year the district received a credit from the FSMC for $225,567.50; however, neither the business manager nor the food service director could explain the source of these earnings. The senior director of Finance at Sodexo School Services offered additional information regarding the source of these credits; however, it provided little toward creating an understanding of how these funds were earned by the district, how to monitor the accuracy of the total, or predict future payments. Some of the contributions to this sum were food service vendors, many others were not. The district has not received a detailed, useful explanation of these credits. This documentation should be requested by WISD from the FSMC.

The district pays the food costs based on monthly district totals by category. The district should request that Sodexo send the district all vendor invoices on a monthly basis to validate the FSMC monthly reconciliation worksheet prior to reimbursing the FSMC for these direct costs.

WISD currently purchases food and not food items through the Tejas Purchasing Cooperative, and WISD has not conducted any research to look at the benefits of using other purchasing groups. One example of another purchasing cooperative used by school districts in the surrounding area is the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative.

Exhibit 9–19 demonstrates the cost per serving of random products found on the Tejas Purchasing Cooperative and the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative bid awards. There will always be variations in prices between individual bids, depending on the winning distributor, and the volume of the bid. Generally, there will be a mix of pricing with some higher and some lower pricing between one bid and another. For some products, there may be quality differences. **Exhibit 9–19** uses the same product codes as often as possible, and a like product was used when the two bids did not contain the exact same product or packaging. There are a number of differences in the products purchased by each of the two cooperatives; for example Tejas purchases 50/50 blend of shredded mozzarella cheese and cheese substitute while Region XI buys 100 percent mozzarella cheese.

Exhibit 9–19 demonstrates that there is a difference in the prices paid. The only way to determine the actual savings one bid will provide the district over another is to apply the pricing using the volume of each specific product that will be purchased for the school year. It is also important to know if the purchase will be a commercial product or a processed USDA food. These two prices will be significantly different in that the district is providing USDA foods with value to the commodity processed foods; therefore, the prices are lower. It should be noted that that does not mean the products cost less. When the price paid, and the value of the USDA foods are combined, the final price is sometimes higher than the same product purchased commercially. When conducting such a study it is sufficient to use only the high volume items, such as pizza, char-patties, French fried potatoes, and canned

EXHIBIT 9–19
WISD PRICE COMPARISON: TEJAS PURCHASING COOPERATIVE VERSUS REGIONAL EDUCATION SERVICE CENTER XI MULTI-REGION FOOD PURCHASING COOPERATIVE, 2011

		TEJAS PURCHASING COOPERATIVE	ESC, REGION 11 MULTI-REGIONAL CHILD NUTRITION COOPERATIVE PURCHASING PROGRAM		
ITEM	UNIT PRICE	CASE PRICE	UNIT PRICE	CASE PRICE	DIFFERENCE
Egg Roll; Frozen: fully cooked; IQF; pork and vegetable,	$0.4500	$27.07	$0.3875	$23.25	Same
Beef patty, flame broiled, precooked w/VVP, 2.4 5oz - COMMERCIAL	$0.4774	$64.45	$ 0.3321	$29.89	2.5 oz Advance
Beef patty, flame broiled, precooked w/VVP, 2.45 oz - COMMODITY	$0.1321	$17.84	$0.1396	$28.48	2.4 oz Advance
Beef steak, chicken fried, 3.0 oz, minimum weight – COMMODITY 3.85 OZ Pierre	$0.3135	$26.65	$0.1998	$ 25.98	3.8 oz Advance
Beef steak, chicken fried, 3.0 oz, minimum weight – COMMERCIAL 3.88 oz. Advance	$0.4093	$16.37	$0.4450	$17.80	3.8 oz Advance
Potatoes, dehydrated, pearls VPT - COMMODITY	12/28 oz $0.126/ oz	$42.41	8/5# $0118/oz	$75.47	Same Product Different Pack
Pancake, round, 1.2 oz	0.0780	$11.23	$0.0743	$10.70	Same
Home style roll dough, white, 2 oz.	$0.0967	$23.69	$0.0973	$14.01	Rhodes/ whole wheat, 2 oz.
Juice, orange pineapple K-PAK 100%	$0.1736	$16.67	$0.1494	$14.34	Same
Juice, apple K-PAK, 100%	$0.1397	$13.41	$0.1180	$11.33	Same
Juice, fruit K-PAK 100%	$0.1468	$14.09	$0.1266	$12.15	Same
Juice, pineapple, carton 100%	$0.1656	$11.59	$0.1493	$10.75	Ardmore
Gatorade- G2, Orange	$0.4963	$11.91	$0.3738	$8.97	Same
Cheerios, enriched & fortified	$0.1917	$18.40	$0.1761	$16.91	CEREAL, APPLE CINN CHEERIO
Corn Pops	$0.1917	$18.40	$0.1761	$16.91	CEREAL, KIX
Tomato Catsup, hamburger, 29% solids VPT - COMMODITY	$2.685	$16.11	$2.48	$14.89	Same
Sauce, Tomato VPT - COMMODITY	$3.508	$21.05	$2.46	$14.77	Same
Salsa VPT - COMMERCIAL	$4.57	$ 27.41	$4.202	$25.21	Same
Salsa VPT - COMMODITY	$3.84	$ 24.39	$3.8433	$23.06	Same

SOURCE: Tejas Coop Order Guide and ESC Region 11 Full Line Groceries Award which may be found at https://www.esccno.org/.

fruits. Low prices on low volume items do not contribute significantly to savings.

There are many factors that contribute to the value of a specific product such as nutrient content, ingredients, portion size, and individual wrappings. When these factors are similar, and one manufacturer's product is significantly less expensive than another's, it is wise to bring the less expensive product in to taste test with students. The more products within a bid category that are acceptable to students and awardable, the more competition the district will get on their bid, and the lower the prices will be.

The total fees paid for the services of Tejas Purchasing Cooperative for WISD for last fiscal year were $6,792.88; the annual cost for WISD to join the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative. is $2,700 for full service ($0.18 x 15,000 students = $2,700), commodity processing and commercial purchasing. It should be noted that the Tejas Purchasing Cooperative may be providing management services to the district other than purchasing food. Prior to determining the value of each it would be necessary to examine the terms outlined in each of the two contracts. If WISD fails to do a comparative price study, the district risks paying a higher cost for food than necessary.

WISD should independently compare the food prices paid through the FSMC to the prices paid by the members of the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative; consolidate and reconcile distributor invoices to validate direct food costs prior to paying the FSMC monthly invoice.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
32. Develop a comprehensive oversight plan to ensure that the district is in compliance with all state and federal regulations governing the Child Nutrition Program, and that program funds are maximized to deliver the highest affordable quality of food and service to students.	$0	$0	$0	$0	$0	$0	$0
33. Submit a revised breakfast in the classroom collection procedure to the Texas Department of Agriculture for approval; and monitor all meal service to ensure that methods used in point of service conform to the approved counting and claiming procedures.	$0	$0	$0	$0	$0	$0	$0
34. Develop strategies for increasing student participation in the School Breakfast Program.	$243,235	$243,235	$243,235	$243,235	$243,235	$1,216,175	$0
35. Monitor Child Nutrition Program operations to ensure that current and accurate nutrient analysis of all meals, by school and menu cycle, meet the federal requirements for reimbursable meals served under the Nutrient Standard Menu Planning approach.	$0	$0	$0	$0	$0	$0	$0
36. Monitor kitchen operations to ensure that accurate food production records are maintained and that district standardized recipes are followed for every preparation.	$0	$0	$0	$0	$0	$0	$0
37. Monitor Child Nutrition Program operations to ensure that all food service staff members are trained on the proper implementation of Offer versus Serve; and that the provision is properly implemented in all schools for breakfast and lunch.	$0	$0	$0	$0	$0	$0	$0
38. Monitor Child Nutrition Program operations to ensure that plate waste studies are conducted and strategies are developed for reducing the amount of food students are discarding.	$191,916	$191,916	$191,916	$191,916	$191,916	$959,580	$0

RECOMMENDATION	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
39. Evaluate the cost of disposable service ware used to determine potentially less expensive alternatives.	$38,708	$38,708	$38,708	$38,708	$38,708	$193,540	$0
40. Raise adult and student full-price lunch prices to ensure that the revenue generated is sufficient to cover the cost of preparing and serving the meals.	$68,162	$68,162	$68,162	$68,162	$68,162	$340,810	$0
41. Remove branded products from the Waco High School menu and substitute in-house brands, or other reimbursable offerings on those serving lines.	$2,888	$2,888	$2,888	$2,888	$2,888	$14,440	$0
42. Develop a pool of substitute employees from which to draw to eliminate the added costs of using an agency.	$37,800	$37,800	$37,800	$37,800	$37,800	$189,000	$0
43. Compare the food prices paid through the food service management company to the prices paid by the members of the Regional Education Service Center XI Multi-Region Food Purchasing Cooperative; consolidate and reconcile distributor invoices to validate direct food costs prior to paying the food service management company monthly invoice.	$0	$0	$0	$0	$0	$0	$0
TOTALS-CHAPTER 9	**$582,709**	**$582,709**	**$582,709**	**$582,709**	**$582,709**	**$2,913,545**	**$0**

CHAPTER 10

TRANSPORTATION

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 10. TRANSPORTATION

The Waco Independent School District (WISD) provides transportation services to its student population in accordance with state and federal laws. WISD Board Policy CNA (LOCAL) states the relevant legal requirements and establishes that "the District shall not provide transportation to any student for whom it does not receive state transportation funds, except as may be required by the individualized education program of a student with disabilities." During school year 2010–11, home-to-school transportation was provided to approximately 2,800 students representing about 18 percent of the enrolled student population. **Exhibit 10–1** summarizes the trend in the number of transported students for school years 2008–09 to 2010–11 by category of service.

Transportation services are provided under contract by a private transportation company. The contract with Student Transportation Specialists, LLC (STS) became effective July 1, 2006. It had an initial term of three years with two three-year optional renewal periods, the first of which was executed. The contract is currently in the final year of this first three-year renewal period. The agreement itself is clear and comprehensive. It establishes a solid foundation of understanding regarding the contractor's responsibilities to the district and the district's responsibilities in return.

The contractor is responsible for all aspects of planning and service delivery including the development of bus routes and schedules, operation of the bus routes on a daily basis, customer service, coordination of student discipline with school administrators, scheduling and provision of special trips, state reporting, and maintenance of the school bus fleet and other WISD vehicles. The bus fleet itself is owned by WISD. Operational oversight responsibility is assigned to the senior director of Student Services, although for all practical purposes, the contractor's Operations manager acts as the district's director of Transportation. Financial oversight is a shared responsibility between several district staff. The coordinator of Accounting and Payroll keeps a billing reconciliation, in line with the process used for all district vendors. Payments for routes are handled by several individuals—regular routes are approved by the senior director of Student Services, while Special Education and Career and Technical Education routes are approved by the appropriate program director. Finally, the assistant superintendent for Business and Support Services and the Purchasing director are responsible for bidding service, fuel, and procuring the bus fleet.

Service is provided on a two-tier bell time structure, with elementary schools on the early tier and high schools on the later tier, with a 30-minute bell time separation in the morning and a 45-minute separation in the afternoon. Transportation services were provided in 2010–11 using 72 active route buses, although there are currently 83 total buses in the fleet including two activity buses. All but eight of the route buses performed two or more individual bus runs each morning. Forty-six route buses provided regular education services and 24 buses provided special needs transportation. In 2009–10 there were 66 active route buses, 44 regular and 22 special needs. There were 10 percent more route buses in 2010–11 while growth in students transported exceeded 27 percent. The overall cost of providing these services for school year 2009–10 was approximately $3.7 million, or nearly $1,700 per transported student.

State transportation funding for regular program students is based upon the preceding school year's linear density and cost per mile. Cost per mile is calculated based on data submitted in the School Transportation Route Services

EXHIBIT 10–1
WISD TRANSPORTED STUDENTS
2008–09 TO 2010–11

SCHOOL YEAR	REGULAR EDUCATION	HAZARDOUS SERVICE	SPECIAL PROGRAM	CAREER AND TECHNICAL	TOTAL
2008–09	1,675	143	286	32	2,136
2009–10	1,861	92	197	33	2,183
2010–11	2,197	290	251	51	2,789

SOURCE: Texas Education Agency, Route Services Report 2008–09, 2009–10, and 2010–11.

Report and the Student Transportation Operations Report. Linear density of bus routes is determined by the number of regular riders carried per mile for all regular bus routes. The allotment is then based on the lower of the actual cost per mile or the maximum amount per mile determined in one of the seven density groupings TEA has established. **Exhibit 10–2** summarizes the density groups.

EXHIBIT 10–2
TEXAS EDUCATION AGENCY DENSITY GROUPINGS

LINEAR DENSITY GROUP	MAXIMUM ALLOTMENT PER MILE
2.40 and above	$1.43
1.65 to 2.399	$1.25
1.15 to 1.649	$1.11
0.90 to 1.149	$0.97
0.65 to 0.899	$0.88
0.40 to 0.649	$0.79
Up to 0.399	$0.68

SOURCE: Texas Education Agency, School Transportation Allotment Handbook, Effective School Year 2010–11.

TEA allocated a total of $589,687 in state funding versus total operating costs of $3,701,361 for school year 2009–10, or 16 percent of total transportation costs. WISD's cost per mile for regular program students in 2009–10 was $3.40 and its linear density value was 0.92. WISD's allotment was therefore based on $0.97 per mile. A total of $352,971 was allocated to WISD for regular programs. Special program funding is provided based on a maximum allotment rate set by the legislature. A total of $202,955 was allocated to the district for special programs and $33,761 was allocated to the district for career and technical programs.

FINDINGS

- The routing software owned by the district is not currently used to develop or manage bus routes. This is a contributing factor to decreased levels of efficiency and effectiveness.
- The current structure of school bell times places unrealistic constraints on the ability of the Transportation Department to provide timely service, and does not facilitate maximum transportation efficiency.
- WISD lacks dedicated transportation expertise within the district's organization structure.
- The district's transportation policies and procedures lack the detail necessary to adequately describe the parameters and constraints under which transportation services will be provided.
- The bus fleet faces a potential block obsolescence problem with the entire fleet aging and becoming due for replacement at the same time.

RECOMMENDATIONS

- **Recommendation 44: Undertake a reimplementation and operational integration of the routing software to support route redesign initiatives.**
- **Recommendation 45: Implement a comprehensive bell time analysis. Consider the adoption of a three-tier bell schedule and reconfiguration that supports the development of efficient and effective transportation service delivery.**
- **Recommendation 46: Establish a transportation management position within the district organization structure responsible for the development of bus routes, contract compliance monitoring and performance management, and transportation liaison responsibilities with school building administrators.**
- **Recommendation 47: Develop enhanced district transportation policies to address all key system operating parameters and constraints.**
- **Recommendation 48: Refocus the bus fleet replacement program to ensure a regular turnover and a stable, sustainable replacement schedule.**

DETAILED FINDINGS

ROUTING EFFICIENCY AND EFFECTIVENESS (REC. 44)

The routing software owned by the district is not currently used to develop or manage bus routes. This is a contributing factor to decreased levels of efficiency and effectiveness.

WISD owns a license to the *Routefinder Pro* routing software from Transfinder. This is a full-featured product currently in use at many Texas school districts. According to the district's contract with Student Transportation Specialists, LLC (STS), the contractor is tasked with managing the use of the software and with the development and maintenance of bus routes.

The current level of system implementation and the expertise of contractor staff do not, however, facilitate its active use in the manner described above. Rather, the bus routes are developed manually and simply documented within the software for the purpose of state reporting and to provide street path information to drivers. Only the morning routes are documented in the routing software. Most routes are duplicated in a word processing software as well.

Further, the district's current use of the system is limited by the documentation of bus routes developed outside the system. Currently, STS staff manually plots bus stops and determine the route path by linking stops in the desired sequence. The timing between stops is based on a default travel speed of 24 miles per hour, which is not always reflective of reality. Rather, the system-documented route is used as a guide only and drivers develop route timing to ensure timely service delivery. Student data is only occasionally transferred to the routing software. Students are not assigned to stops and routes within the software and route rosters for eligible students are not developed. Therefore, WISD does not know which students are riding on its bus routes.

In addition, the current bus routing scheme fails to maximize the use of available seating capacity on individual bus runs and does not maximize the use of each bus during the course of the service day. **Exhibit 10–3** summarizes the use of available seating capacity by type of bus run in the current WISD system. **Exhibit 10–4** summarizes the use of the buses for established home-to-school transportation services.

EXHIBIT 10–3
WISD SEATING CAPACITY USAGE FOR HOME-TO-SCHOOL SERVICES
2011–12

PERCENT OF AVAILABLE SEATING CAPACITY USED	REGULAR PROGRAM ROUTES	SPECIAL PROGRAM ROUTES (EXCLUDES MIDDAY)
< 10%	5	23
11-20%	25	1
21-30%	12	0
31-40%	3	0
41-50%	2	0
51-60%	0	0
> 60%	0	0
Total daily routes	**47**	**24**

SOURCE: Texas Education Agency; Mileage Report 2010–11 (detail as provided); route data extracted from Transfinder software on 11–08–11; Review Team analysis, November 2011.

EXHIBIT 10–4
WISD BUS ASSET USAGE FOR HOME-T0-SCHOOL SERVICES
2011–12

NUMBER OF MORNING BUS RUNS COMPRISING ROUTE	REGULAR PROGRAM ROUTES	SPECIAL PROGRAM ROUTES (EXCLUDES MIDDAY)
1	5	1
2	41	23
3	1	0
> 3	0	0
Total daily routes	**47**	**24**

SOURCE: Texas Education Agency, Mileage Report 2010–11 (detail as provided); route data extracted from Transfinder software on 11–08–11; Review Team analysis, November 2011.

It should be noted that all of the statistics presented in these exhibits are estimates based on an analysis of available data.

In the morning bus routes shown in **Exhibit 10–4**, the average number of runs serviced by each bus is less than two, with only one bus providing a third morning run. This number is a low level of bus usage for a relatively dense urban-suburban operating environment. Analysis indicates that the average level of seat capacity usage across all regular program bus runs is just 19 percent, assuming 72 available seats on each run. For the special needs program, it is just 7 percent, assuming 48 available seats on each run. This analysis is based on an estimate of available capacity based on rated capacity of buses noted in fleet inventory provided for the review.

In recognition of issues with routing efficiency, in October 2011 WISD engaged an outside consultant to perform a routing efficiency study. The completed study was delivered to the district on March 12, 2012. The desire of the school district administration to increase overall bus route efficiency and effectiveness is noteworthy, together with recognition of the value in having an outside expert undertake the evaluation.

As industry best practices note, the functional responsibility for route planning is normally conducted within an annual cycle that corresponds to the school year. Planning occurs in the months preceding the start of school. Bus routes implemented for use at the start of school are then modified and maintained throughout the school year as new students are added, departing students deleted, and other alterations such as address changes and student program reassignments are accommodated. In all cases the objective is to maintain the accuracy and integrity of route information including the

time, distance, street path, and assigned student roster. Planning of bus routes for the following school year typically occurs in parallel with these maintenance activities.

The key to the success of this annual cycle within a sizable operation such as WISD is a functional, integrated bus routing software. The task becomes unmanageable in the absence of a software tool, necessitating a default to manual, less precise processes. Given the complexity inherent in a large operation, manual processes typically result in perpetuation of inefficient bus routes from year-to-year, excessive slack in the system in terms of excess capacity, informal modification of routes by bus drivers, and a lack of data and information on which to base analyses and to ensure student safety.

Further, routing software requires three key elements of data to be functional: an accurate electronic map; school (destination) locations and bell times; and student data including address, school, and grade assignments. This data must be carefully maintained for accuracy, which in an ever changing environment requires constant attention. Student data in particular requires an ongoing effort to synchronize changes in the routing software database with those changes in the district's student information system. Map data as well needs to be consistently tuned and kept up to date so that the embedded information (road travel speeds, hazardous walking conditions, etc.) are accurately reflected on the bus routes.

The district has taken an important first step by commissioning a route efficiency study. This study will likely provide recommendations to assist WISD in bringing overall transportation costs more in line with the statewide average cost per student and to achieve a sustainable balance between cost and service quality.

As another step to increasing the efficiency of bus routing and in preparation for school year 2012–13, the district should undertake a reimplementation and operational integration of the routing software to support route redesign initiatives. Implementation of routing software is not just about training users on the functionality of the product itself. While this is an important component, successful implementation is more about integrating the use of the software into the day-to-day operations of the transportation service. This effort requires a great deal of up-front planning and discussion regarding the type, quantity, and current status of information that the system needs to provide so that a rational plan can be established to set the system up in a way that will support these needs. Policies, processes, and procedures must be modified to take advantage of system capabilities, and links must be established with other software platforms and district processes to ensure that the data necessary for system operation is available, complete, and current.

Successful implementation and use of routing software can become a major undertaking. An initial investment in outside help and expertise may be required. Use of external consultants would result in a one-time cost of approximately $50,000. However, the return on this investment of time and attention can be substantial. While there is no definitive information available, benchmarking surveys conducted in the states of Michigan and Pennsylvania indicate that school districts using routing software are 8 to 20 percent more efficient than those that do not. Using the low end of this range for comparison (8 percent), this initiative could yield annual recurring savings of $296,109 to WISD beginning in school year 2013–14. Savings are calculated using WISD 2009–10 total transportation expenditures of $3,701,361 x 8 percent = $296,109.

TRANSPORTATION EFFICIENCY (REC. 45)

The current structure of school bell times places unrealistic constraints on the ability of the Transportation Department to provide timely service, and does not facilitate maximum transportation efficiency. Time tiers are defined by the clustering of individual school start and end times such that they coincide in distinct groupings. In turn, separating the groups facilitates the ability of buses to service multiple bus runs in the morning or afternoon transportation period. The review team's analysis of the WISD transportation system indicates a planned two-tier system (two groupings) that is overly constrained by the bell time structure and that fails to yield adequate levels of efficiency relative to peer school districts. Peer districts are districts similar to WISD used for comparison purposes. As previously mentioned, the overall cost of providing transportation services for school year 2009–10 was approximately $3.7 million, or nearly $1,700 per transported student. This statistic compares unfavorably with the peer districts.

Exhibit 10–5 summarizes the performance of WISD and four peer school districts in school year 2009–10. It should be noted that these results are based on route statistics that were self-reported to TEA by WISD and the peer districts.

Several high-level cost and service statistics are indicative of a high cost operation with significant slack present in the

EXHIBIT 10–5
WISD AND PEER DISTRICT COMPARISON SUMMARY
2009–10

DISTRICT	TOTAL EXPENDITURES	TOTAL BUSES	AVERAGE DAILY RIDERSHIP	COST PER STUDENT	COST PER BUS	BUSES PER 100 STUDENTS	STUDENTS PER BUS
Bryan ISD	$4,002,954	137	5,713	$700.67	$29,218.64	2.40	42
Donna ISD	$3,067,898	84	7,532	$407.32	$36,522.60	1.12	90
Harlandale ISD	$2,730,927	55	1,274	$2,143.58	$49,653.22	4.32	23
Tyler ISD	$4,360,910	130	6,267	$695.85	$33,545.46	2.07	48
Waco ISD	**$3,701,361**	**79**	**2,183**	**$1,695.54**	**$46,852.67**	**3.62**	**28**
Statewide	**$1,345,266,375**	**40,322**	**1,596,304**	**$842.74**	**$33,363.09**	**2.53**	**40**

SOURCE: Texas Education Agency, 2009–10 Operation Report and Route Services Report; Review Team Analysis, November 2011.

current routing scheme. This slack is observed in the relatively low levels of capacity and asset usage described earlier. As shown in **Exhibit 10–5**, the costs per student and per bus are significantly higher for WISD than for all but one of the peer districts. Additionally, the cost per student is double the statewide average. The number of students transported per bus is among the lowest in the peer group and 30 percent lower than the statewide average.

In addition, WISD has low level of bus usage for a relatively dense urban-suburban operating environment. Compounding this problem is that insufficient time exists between the two bell time tiers (shown in **Exhibits 10–3** and **Exhibit 10–4**). With only 30 minutes separating the two bell time groupings in the morning, and 45 minutes in the afternoon, insufficient time exists to develop bus runs that use all or most of the available seating capacity. **Exhibit 10–6** further illustrates this constraint. Factoring in that each bus must travel empty from the end of its first run to the first stop on its second run, the actual time available to execute each run is limited to 15–30 minutes, and is sometimes less.

It is important to note that the fixed parameters established by the current bell times and district policy, while negatively affecting efficiency, have the opposite effect on service levels for eligible students. Short bell time windows facilitate short ride times. Additionally, low seating capacity usage facilitates less crowded buses. Each of these service quality benefits is gained at the expense of efficiency however. The time constraints in the morning, in particular, are so tight that, in practice, buses on the first time tier (elementary school) must arrive at school and discharge their students very early relative to the school start time in order to have time to complete their second bus run on time. In some cases, these second runs are discharging secondary school students very close to

EXHIBIT 10–6
WISD SCHOOL BELL TIME CONSTRAINTS
2011–12

SCHOOL TYPE	START TIME (AM)	LENGTH OF INSTRUCTIONAL DAY (HRS)	END TIME (PM)	SERVICE TIER	TIME BETWEEN AM TIER (MIN)	TIME BETWEEN PM TIERS (MIN)
Elementary Schools	8:00	7.25	3:15	1		
Intermediate School	8:15	7.5	3:45	2	15	30
Middle School	8:30	7.5	4:00	2	30	45
Junior High School	8:30	7.5	4:00	2	30	45
High Schools	8:30	7.5	4:00	2	30	45
High School	8:25	7.5	4:00	2	25	45

SOURCE: Bell time information provided by WISD transportation contractor on 11–08–11; Reveiw Team analysis, November 2011.

the school start time, leaving insufficient time for breakfast and other pre-school activities.

Best practices note that the efficiency of the district's bus routes is an outcome of effective planning processes relative to established planning parameters. The key parameters are established by district policy. Meticulous procedures for assembling individual bus runs in accordance with these parameters and linking these bus runs together into daily bus routes will produce maximum efficiency relative to the established parameters. In regards to planning and process, the dual goal should be to use as much of the available seating capacity as possible on each individual bus run, and to reuse the bus as many times as possible over the course of the service day. It should be noted that the planning parameters constrain the potential maximum efficiency, and the associated planning process delivers the actual result.

Further, the key planning parameters include eligibility for service, school bell times, maximum allowable student ride times, seating capacity limitations, and placement of bus stops. While eligibility policies establish the overall scope of transportation service provided, school bell times define the maximum number of times a bus might be reused each day and, together with ride time policies, the maximum length of individual bus runs. In addition, seating capacity and bus stop placement influence the logistical efficiency of individual bus runs.

In order to increase efficiency in the Transportation Department, the district should implement a comprehensive bell time analysis. As part of the analysis, the district should consider the adoption of a three-tier bell schedule and reconfiguration that supports the development of efficient and effective transportation service delivery. The geography of the school district is such that reorganizing school start times into three groupings is viable, implementation of which could reduce the number of buses required by a third with a large decrease in overall costs. This would be feasible because most buses would be able to service three morning and afternoon bus runs instead of the two they currently service in the existing two-tier structure.

Given the wide-ranging impact on students and the community as a whole, the district should be confident of the outcome before committing to any change in bell times; thus, a comprehensive cost-benefit analysis must be a precursor to any implementation. Bell time changes can initially be modeled using current route statistics. Additionally, should this preliminary analysis indicate that significant benefits are possible; an entirely new system of routes should then be developed within the routing software using live student data and the prospective revised bell times in order to fully quantify the benefits and costs. A robust program of community outreach must also be a critical part of the process, whereby all stakeholders are informed and engaged in order to minimize resistance to change that will be a necessary part of the initiative.

It must be noted that WISD only provides transportation service to a small proportion of its student population. The changes recommended to increase transportation efficiency within the existing bell time structure would significantly lower cost but would also have an adverse effect on service quality for those students accessing transportation. For example, higher levels of seating capacity usage and longer ride times would negatively impact transportation service quality. Bell time changes meanwhile would affect the enrolled student population as a whole. The tradeoffs must become part of the discussion as the school district considers action on the recommendations related to routing efficiency.

Should the district be successful in rearranging bell times to a three-tier structure, it can expect the number of route buses required to be reduced by 30 percent. This would not however result in a proportional decrease in cost as each remaining route bus would be in operation for a longer period each day, increasing fuel, maintenance, and staffing (bus driver) costs. These marginal increases would nevertheless be far outweighed by the benefit of reducing the count of buses required, and the district could anticipate realized savings of 20 percent or more, or $740,272 annually beginning in school year 2013–14. Savings are calculated using WISD 2009–10 total transportation expenditures, as shown in **Exhibit 10–5**, of $3,701,361 x 20 percent = $740,272.

The fiscal impact assumes a delay in the anticipated savings due to the time it would take the district to conduct a comprehensive cost-benefit analysis which would precede a reordering of school bell times system-wide. It is also important to note that successful implementation and use of the routing software would assist in reorganization of school bell times.

TRANSPORTATION MANAGEMENT ORGANIZATION STRUCTURE (REC. 46)

WISD lacks dedicated transportation expertise within the district's organization structure.

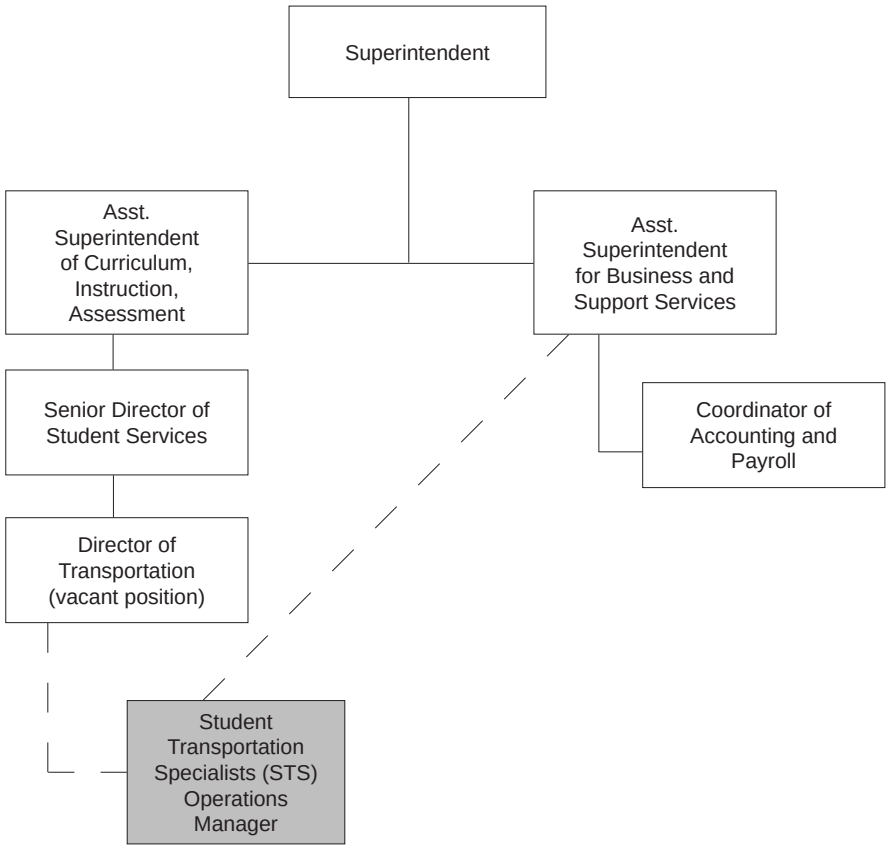
Currently, transportation management as a functional responsibility is effectively absent from the district's organization structure. The title director of Transportation exists on the organization chart under the senior director of Student Services, but there is no district employee filling this position. Rather, for all practical purposes, the contractor's Operations manager serves in this role. The Operations manager is the primary point of contact for all questions related to transportation. This position serves as the transportation liaison for the district's administrators, is tasked with the development and maintenance of bus routes, and manages all day-to-day transportation operations.

Exhibit 10–7 shows the organization of the WISD Transportation Department. Student Transportation Specialists, LLC (STS), the bus contractor, is noted within the organization chart although the contractor operates independently of the district.

Outsourcing transportation services can be an effective management and cost control strategy for a school district. Transportation is a non-core function and a support service to the school district. It lends itself well to private sector business management principles. However, responsibility and accountability for the efficiency and effectiveness of transportation services cannot be outsourced together with the service delivery itself. The absence of dedicated transportation expertise within the district's organization structure leads to insufficient oversight of contractor operations and a lack of understanding relative to the transportation cost and service implications of programmatic and policy decisions.

Outsourcing establishes a customer-vendor relationship. The terms and conditions of this relationship should be defined within the contractual agreement. Ensuring that the vendor meets the terms of the contract is the customer's responsibility and a primary function of the transportation management

EXHIBIT 10–7
WISD TRANSPORTATION DEPARTMENT ORGANIZATION
2011–12



NOTE: The dashed lines indicate lines of communication between the District and Student Transportation Specialists.
SOURCE: WISD and Student Transportation Specialists, LLC, 2011.

infrastructure that must remain in place within the school district.

Further, transportation contractors are generally compensated based on the volume of services provided. The structure of the WISD agreement with STS is typical of the industry in establishing a fixed price per day, with adjustments, for each bus in operation. The contractor's compensation and profit is therefore maximized by increasing the number of buses in operation. There is a conflict that arises in making the contractor responsible for developing the bus routing scheme that they will also operate. Even the best contractor has no motivation to maximize efficiency by minimizing buses. Separating this factor and retaining responsibility as a district function leads to the most appropriate division of accountability whereby the contractor executes a route scheme designed by the district. The design of this system must balance the competing demands of cost efficiency and service effectiveness. Only the district itself can make the compromises required to achieve the desired balance.

The manner in which the contractor executes its responsibilities and analyzes whether its performance is in keeping with the goals and objectives of the school district must also be an in-house management responsibility. Maintaining a liaison with the users of the system (building administrators, parents) such that the system can be constantly optimized cannot be left to the contractor. The contractor is a vendor, and will be responsive to any customer request for service. Whether this request is in keeping with the strategic design of the system should not be a determination made by the contractor. This strategic performance management function must be retained by the district.

The performance outlined previously results at least partially through an absence of ongoing management attention by district administrators. This is not to say that transportation issues are ignored; rather, there are insufficient staff resources dedicated to this function. While an investment is required to add district management staff, experience indicates that the benefits realized almost always outweigh the costs.

WISD should establish a transportation management position within the district organization structure responsible for the development of bus routes, contract compliance monitoring and performance management, and transportation liaison responsibilities with school building administrators. The prospective transportation management position is best suited to be placed under the assistant superintendent for Business and Support Services.

The fiscal impact of creating a director of Transportation position is $80,058 annually, based on salary information for a district the size of WISD, obtained from the 2010–11 District Personnel Report conducted by the Texas Association of School Boards. Benefits for this position are estimated to be $12,009 (15 percent of salary). Thus, the total annual cost to the district is $92,067 ($80,058 + $12,009). This additional cost represents approximately two percent of current transportation expenditures, and is a necessary addition to realize the benefits described in this and the other recommendations presented in this chapter.

TRANSPORTATION POLICIES (REC. 47)

The district's transportation policies and procedures lack the detail necessary to adequately describe the parameters and constraints under which transportation services will be provided.

Review of the Transportation Department shows that WISD has documented transportation policies. These are contained within five individual statements under the title "Transportation Management" and summarized as follows:

1. Board Policy CAN (LEGAL): Student Transportation —Provides descriptive definitions for vehicle types used in transporting school children, quotes the legal authority for the provision of service, describes the state funding provided for the purpose and details the various types of transportation service that the district is able or obligated to provide.

2. Board Policy CNA (LOCAL): Student Transportation —Expands and interprets the state requirements described in the preceding policy statement. Defines that service will only be provided to students for whom the district receives state funding, that service will be to and from authorized bus stops, and the conditions under which hazardous service shall be provided.

3. Board Policy CNB (LEGAL): District Vehicles— Provides a restatement of the legal authority for the district to purchase or lease vehicles for student transportation and other purposes, and the restrictions under which these vehicles must be operated.

4. Board Policy CNB (LOCAL): District Vehicles—Expands and interprets the state requirements by restricting the use of district vehicles to school-related use only with an exception for emergency use by local government agencies.

5. Board Policy CNC (LEGAL): Transportation Safety —Provides a restatement of the state safety and use standards for school vehicles.

Collectively these policy statements cover many, but not all, of the core parameters that define transportation efficiency and effectiveness. The bulk of the policy documentation provides a restatement of and reference to Texas state requirements to which all local school districts must comply. However, the review team found that the policies that are specific to WISD are limited in scope and only provide a marginal enhancement to the state level requirements.

There are three core elements of the local policy that serve to illustrate the importance of policy in constraining and defining service delivery. The base statement that "The District shall not provide transportation to any student for whom it does not receive state transportation funds, except as may be required by the individualized education program of a student with disabilities," as defined in Board Policy CAN (LOCAL) broadly defines transportation service eligibility, and is a critical interpretation of the state law that says a district may (not shall) operate a school transportation system. The WISD policy goes on to describe that transportation service shall only be provided to and from authorized bus stops. This statement further constrains and defines the characteristics of the service to be provided and is an appropriate and necessary enhancement to facilitate effective route planning. This characteristic is also true of the statement that defines the characteristics of hazardous walking areas.

However, there are a number of core planning and operational management elements for which the WISD local board policy is silent, bringing into question the parameters under which transportation service is provided and complicating the planning process. Examples of these include, but are not limited to:

- Measurement standard for walking distance to school to establish eligibility;
- The allowable walking distance to a bus stop;
- Bus stop placement parameters such as only allowing bus stops at intersections or requiring a right-side pickup;
- Allowable ride time standards for students;
- Seating capacity limitations such as limiting middle and high school routes to two-per seat;
- Student behavior management protocols;
- Inclement weather procedures;
- Distribution procedures for providing route information to parents, students, and schools;
- Student information management responsibilities; and
- School bell time management protocols.

The design and implementation of revised operating policies is a foundational requirement for enhancing the overall efficiency and effectiveness of the transportation system. Further, each of the other recommendations contained within this chapter is dependent on a clear set of policy objectives and planning parameters for successful implementation. Developing revised bus routes, for example, will prove to be an unmanageable exercise in the absence of clear planning parameters such as those just described.

The district should develop enhanced district transportation policies to address all key system operating parameters and constraints. Revised policies are best developed in a collaborative environment whereby each major stakeholder group is represented and a diversity of opinion can be shared. It is critical that transportation expertise be represented on any policy development committee to provide technical guidance and feedback on the likely service quality and cost impacts of any changes being contemplated. The effort should begin with the formation of a policy development committee comprised of representatives from each major stakeholder group. This committee should work through and complete a draft for the revised policy statements. The policies will necessarily have to be approved by the Board of Trustees, but by having an inclusive development process the district will ensure a successful implementation.

This recommendation can be implemented with existing resources.

THE FLEET REPLACEMENT SCHEDULE (REC. 48)

The bus fleet faces a potential block obsolescence problem with the entire fleet aging and becoming due for replacement at the same time. As mentioned during onsite interviews, the district purchased the entire fleet in 2006 at the inception of the current contract with STS with the intent of beginning a regular replacement program such that a portion of the fleet is replaced on a regular basis, creating a regular rotation and ensuring that the district does not operate all new or all old vehicles. This schedule was initially adhered to, but is not proceeding at an appropriate pace.

Prior to the current transportation contract with STS, WISD did not own a bus fleet. The former transportation contractor for the WISD provided the bus fleet as part of the contract. This is the most common structure for transportation contracts around the nation. However, a different approach pursued by many school districts is to retain ownership of the bus fleet and for the contractor to operate these district-owned buses. The capital costs of the fleet are incurred by the district under both models, either directly or through the rates charged by the contractor. The advantage to the district owning the fleet is in the flexibility this structure provides should the district choose to bring the service back as an in-house operation in the future.

At the termination of the former contract, a strategic decision was reached to acquire a district-owned bus fleet as part of the new contract with STS. An entirely new fleet was acquired using a debt financing mechanism for the beginning of the contract in school year 2006–07.

It is imperative that the bus fleet be subjected to a regular program of capital investment and replacement. A balance must be achieved that optimizes capital and operating (i.e., vehicle maintenance and repair) costs while ensuring a safe and reliable fleet. By purchasing an entirely new fleet the district ensured minimal operating costs and a high degree of fleet reliability in the early years after the fleet was acquired. It also introduced the potential for a block obsolescence problem with the entire fleet aging and becoming due for replacement at the same time. This factor would cause the entire fleet to become less reliable and more costly to operate each year, and it would create the need for another massive investment to replace all vehicles at the same time at a fixed point in the future.

The district, to its credit, recognized this potential and planned for a program of early replacement whereby a portion of the fleet was to be replaced each year with new vehicles even though the vehicles being replaced were relatively new themselves. This program would create a stagger in the age of the fleet and allow for the creation of a balanced fleet replacement program in future years. It would, however, also require a high degree of discipline in that perfectly functional and relatively young buses would be sold out of the fleet each year for the first several years of the program, and the cost of new vehicles incurred in turn.

Exhibit 10–8 illustrates that the district kept on track with this program until recently. The fleet consists of 83 buses. This schedule implies that approximately 8 must be replaced each year to establish a regular, balanced ten-year replacement schedule.

EXHIBIT 10–8
WISD HISTORICAL FLEET REPLACEMENT

MODEL YEAR	BUSES IN FLEET
2006	57
2007	5
2008	8
2009	8
2010	3
2011	2
TOTAL	**83**

SOURCE: Fleet list as provided by WISD.

As shown in **Exhibit 10–8**, in 2010 and 2011, the district has failed to replace sufficient vehicles to keep on this schedule after doing a good job in the prior three years. Failure to accelerate the program of timely replacement will endanger the viability of the fleet, as many of the original 2006 purchases get older, less reliable, and more costly to operate over the next few years.

The district should refocus the bus fleet replacement program to ensure a regular turnover and a stable, sustainable replacement schedule. This effort will require that a long term replacement plan be developed whereby each individual unit is tracked and targeted for replacement in a particular year, and that the funding be set aside periodically over time to ensure that replacements can occur on schedule. It should be the responsibility of the district's transportation manager to design and implement the replacement program.

The fiscal impact of maintaining a regular program of fleet replacement is difficult to predict. The foundation for the recommendation is, rather, one of future cost avoidance. Investing in the fleet minimizes future service breakdowns and other service quality issues. It also balances the capital and operating cost equation to ensure that the district's future operational costs are predictable.

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	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
44. Undertake a reimplementation and operational integration of the routing software to support route redesign initiatives.	$0	$296,109	$296,109	$296,109	$296,109	$1,184,436	($50,000)
45. Implement a comprehensive bell time analysis. Consider the adoption of a three-tier bell schedule and reconfiguration that supports the development of efficient and effective transportation service delivery.	$0	$740,272	$740,272	$740,272	$740,272	$2,961,088	$0
46. Establish a transportation management position within the district organization structure responsible for the development of bus routes, contract compliance monitoring and performance management, and transportation liaison responsibilities with school building administrators.	($92,067)	($92,067)	($92,067)	($92,067)	($92,067)	($460,335)	$0
47. Develop enhanced district transportation policies to address all key system operating parameters and constraints.	$0	$0	$0	$0	$0	$0	$0
48. Refocus the bus fleet replacement program to ensure a regular turnover and a stable, sustainable replacement schedule.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 10	**($92,067)**	**$944,314**	**$944,314**	**$944,314**	**$944,314**	**$3,685,189**	**($50,000)**

CHAPTER 11

COMPUTERS AND TECHNOLOGY

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 11. COMPUTERS AND TECHNOLOGY

To achieve a technology-rich educational environment, Texas public school districts must develop an organizational structure and plan to address hardware, software, training, and administrative support needs. Texas public school districts vary in the assigned responsibilities of their technology departments. Some departments support administrative functions only while others are responsible for supporting both administration and instruction. Well-managed technology departments guide daily operations by using a clearly defined plan that is based on appropriate goals and that contains clearly assigned responsibilities, procedures for developing and applying technology, and a customer service system which meets and anticipates user needs.

According to the district's website, the mission of the Technology Services (TS) Department of the Waco Independent School District (WISD) is "to eliminate obstacles and excuses to serve the technology needs of students and staff with excellence." The department supports instructional learning and administrative functions by providing a variety of technology services. The Technology Services Department is headed by a director who reports to the assistant superintendent of Curriculum, Instruction, and Assessment. The department is organized into three sections: Network Services, Management Information Services, and Support Services.

Exhibit 11–1 displays the organization of the WISD Technology Services Department.

The Network Services section of the department includes three Network Support technicians who are managed by one Network Support specialist. They are responsible for administering the district's network infrastructure, ensuring stability, and providing security through maintenance and monitoring of the district's wide area network (WAN). Their major responsibilities also include installation, testing, and maintenance of network hardware and software.

The Management Information Services section of the Technology Services Department is staffed by two employees who provide implementation and operational support for the district's administrative/business applications, including the Student and Business Information Management System. This section is also responsible for performing collection, data entry, auditing, and reporting of Public Education Information Management System (PEIMS) business data. However, at the time of this study, WISD was in the process of hiring a full time PEIMS coordinator and moving this function under the Student Services Department. Subsequent to the onsite visit, WISD reported a PEIMS coordinator for Student Services has been hired. One Management Information Systems coordinator manages this group.

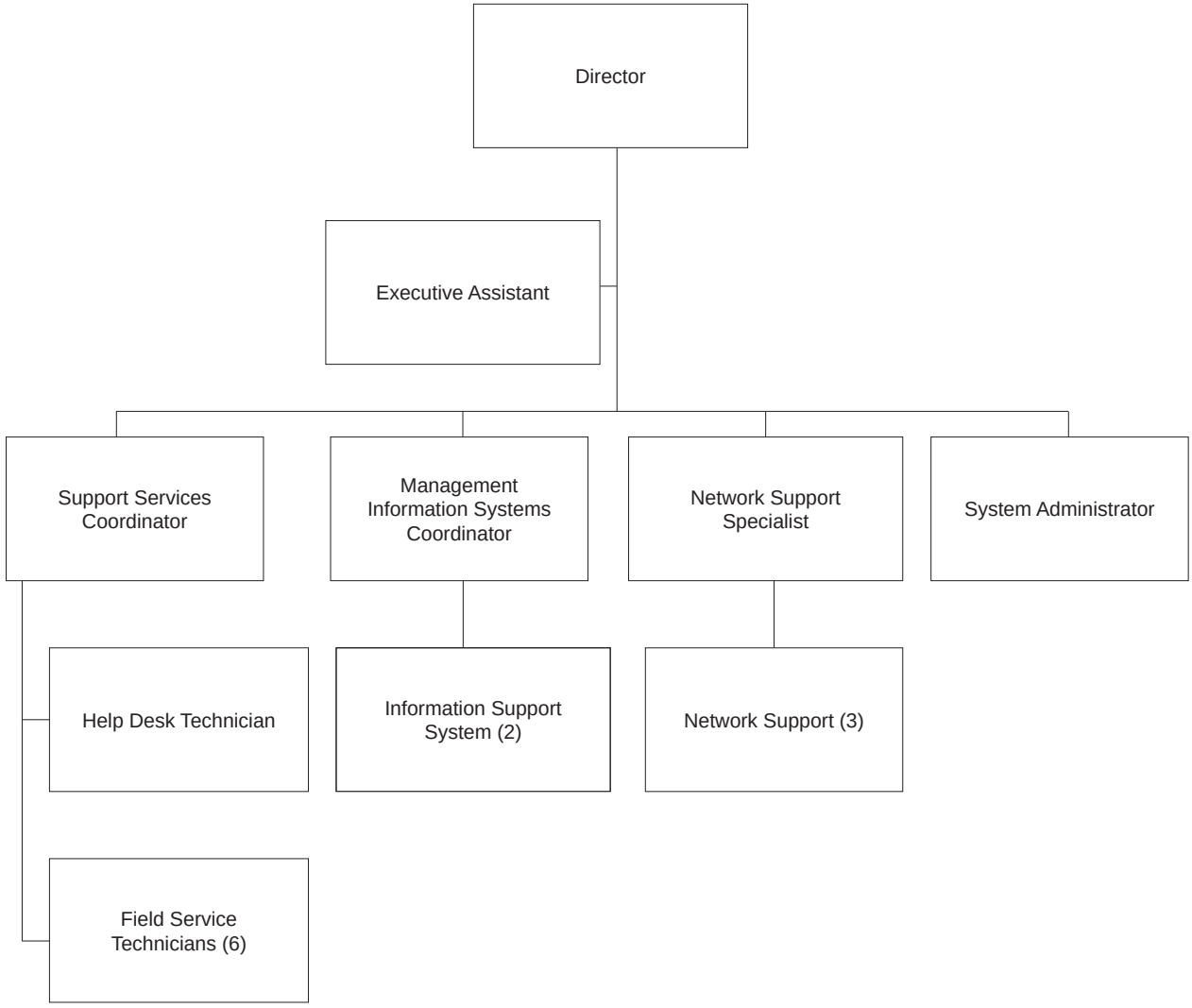
The Support Services section is staffed by eight employees. The Support Services coordinator manages one Help Desk technician, whose primary responsibility is to provide help desk support to district staff and manage the district's technical work order system, and six Field Service technicians, who provide onsite technical support by installing and maintaining computer hardware and software throughout the district. This section also supports all devices including whiteboards, smart boards, projectors, clickers, scanners, digital cameras, and printers.

The district has recently moved the Instructional Technology function, including the district's two Instructional Technology coordinators, into the Curriculum, Instruction, and Assessment Department. The Instructional Technology coordinator's responsibilities include: facilitating the effective use of computers and technology in instructional programs districtwide; assisting in the development of short- and long-range plans for the integration of technology into the instructional program; and coordinating and implementing the technology staff development and training program.

WISD has 2,800 desktops and laptop computers to support its students and staff. Each teacher has a computer with Internet connectivity located in their classroom. In addition to desktops and laptop computers, the district has more than 700 computer tablets. Campuses have interactive white boards, projectors, and other instructional technology devices for their teachers and staff to use in the classrooms.

The district uses eFinance software for its business system to manage and monitor its financial, personnel, and purchasing activities. The district's student management system, SunGard's eSchool Plus, is used to track and report PEIMS student data such as student demographic information as well as attendance and discipline data.

EXHIBIT 11–1
WISD TECHNOLOGY SERVICES DEPARTMENT ORGANIZATION



SOURCE: WISD Technology Services Department, November 2011.

FINDINGS

- WISD lacks a comprehensive professional development program with specific standards and training requirements to ensure that district staff is proficient in the use of technology.
- WISD lacks an effective comprehensive long-range technology plan.
- WISD's Technology Services Department lacks documented standards, policies, and procedures for technology-related operations.
- WISD does not currently have a comprehensive disaster recovery plan.
- WISD does not have a districtwide network operating system that provides directory services to all users.
- WISD does not have an adequate system for managing technology work orders and cannot accurately measure the performance of its technical staff.
- WISD lacks processes and procedures to ensure the accuracy of information reported to the Public Education Information Management System.

- WISD's technology standards for the purchase of technology-related items are not always enforced. As a result, many schools have acquired hardware and/or software items that do not conform to district technology standards, in some cases rendering the items unusable.

RECOMMENDATIONS

- **Recommendation 49: Develop a comprehensive professional development program to ensure that district staff is proficient in the use of technology.**
- **Recommendation 50: Establish a technology planning committee comprised of stakeholders including administrators, principals, teachers, students, and community members to develop a three-year long-range technology plan with the necessary components to make it a comprehensive and effective management tool.**
- **Recommendation 51: Develop and publish a technology-related standard operating procedures document.**
- **Recommendation 52: Develop a comprehensive disaster recovery plan. The plan should include emergency contacts for Technology Services Department staff, district administrators, and hardware and software vendors.**
- **Recommendation 53: Implement a districtwide directory service.**
- **Recommendation 54: Acquire a web-based work order system that allows users to report issues, track the status of open work orders, and is capable of providing the district with reports that can be used to measure the performance of technical staff.**
- **Recommendation 55: Develop processes and procedures that encompass all steps necessary to submit error-free data to the Public Education Information Management System.**
- **Recommendation 56: Establish detailed procedures for the procurement of technology software and equipment to ensure that purchases conform to the district's technology standards.**

DETAILED FINDINGS

TECHNOLOGY PROFESSIONAL DEVELOPMENT PROGRAM (REC. 49)

WISD lacks a comprehensive professional development program with specific standards and training requirements to ensure that district staff is proficient in the use of technology. Additionally, there is no districtwide policy that defines mandatory technology proficiency levels for teachers or timeframes for becoming proficient or integrating technology into the curriculum.

WISD's 2011–2014 Technology Plan Goal 2 focuses on providing professional development related to integrating technology into teaching and learning (**Exhibit 11–2**). Objective 2.1 of Goal 2 outlines that the district will develop strategies to establish technology proficiencies based on standards such as State Board for Educator Certification (SBEC). Although the district indicates that this objective

EXHIBIT 11–2
WISD TECHNOLOGY PLAN
GOAL AND OBJECTIVES REGARDING PROFESSIONAL DEVELOPMENT
2011–14

GOAL	OBJECTIVE
GOAL 2: The District provides professional development on integrating technology into teaching and learning, instructional management, and administration (Educator Preparation and Development).	**OBJECTIVE 2.1**: Develop strategies to establish technology proficiencies for educators based on the K-8 Technology Application TEKS and SBEC standards for educators. **OBJECTIVE 2.2:** Provide professional development on integrating technology into teaching and learning as well as into instructional management. **OBJECTIVE 2.3**: Provide ongoing technology staff development in the use of technology to accomplish non-instructional tasks. Implement the use of the TEA provided WEB portal titled Project Share.

SOURCE: WISD Technology Plan 2011–14.

has been accomplished, the district does not have documented specific proficiencies for teachers and non-instructional staff that will meet these standards.

Although the district has scheduled training, there are no documented districtwide minimum training requirements, either in hours or in types of training. Principals are largely responsible for identifying and scheduling the training needed at their respective campuses. This circumstance potentially makes the technology training inconsistent and inequitable among schools and staff.

WISD has installed interactive whiteboards, provided projectors, implemented wireless technology throughout the district, and recently introduced tablet devices such as iPads in addition to computers and laptops for teachers' use at each campus. However, during onsite observations and interviews with teacher groups and staff, most teachers indicated that they either did not have the knowledge needed to use the technologies, or were in the early stages of learning how to use them. As a result, true integration of technology into the teaching curriculum does not occur. Teachers and staff must be proficient in the use of available technology tools for true integration.

TEA developed the Texas School Technology and Readiness (STaR) chart for use by campuses and districts in conducting self-assessments of their progress toward integrating technology into the curriculum in alignment with the goals of the State Board of Educations' (SBOE's) Long-Range Plan for Technology, 2006–2020. The four key areas of the STaR chart are Teaching and Learning; Educator Preparation and Development; Leadership, Administration, and Instructional Support; and Infrastructure for Technology. The STaR chart includes four levels of progress in each of the four key areas: Early Tech, Developing Tech, Advanced Tech, and Target Tech. **Exhibit 11–3** displays the assessment focus areas and scoring within each of the STaR chart key areas.

Exhibit 11–4 shows a summary of WISD's 2010–11 STaR chart ratings by campus, with both the rating for level of progress and the actual score provided in each of the four focus areas. When comparing campus progress in the Summary STaR Chart Ratings in the key areas of Teaching and Learning and Educator Preparation and Development to the areas of Leadership, Administration, and Instructional Support and Infrastructure for Technology, it is clear that far fewer campuses have progressed beyond the Developing

EXHIBIT 11–3
TEXAS CAMPUS STaR CHART FOCUS AREAS AND SCORING

KEY AREA	FOCUS AREAS	SCORES DEPICTING LEVELS OF PROGRESS
Teaching and Learning	• Patterns of classroom use • Frequency/design of instructional setting using digital content • Content area connections • Technology application TEKS implementation • Student mastery of technology applications (TEKS) • Online learning	Early Tech (6–8) points Developing Tech (9–14) points Advanced Tech (15–20) points Target Tech (21–24) points
Educator Preparation and Development	• Professional development experiences • Models of professional development • Capabilities of educators • Technology professional development participation • Levels of understanding and patterns of use • Capabilities of educators with online learning	Early Tech (6–8) points Developing Tech (9–14) points Advanced Tech (15–20) points Target Tech (21–24) points
Leadership, Administration, and Instructional Support	• Leadership and vision • Planning • Instructional support • Communication and collaboration • Budget • Leadership and support for online learning	Early Tech (6–8) points Developing Tech (9–14) points Advanced Tech (15–20) points Target Tech (21–24) points
Infrastructure for Technology	• Students per Classroom Computers • Internet Access Connectivity Speed Classroom Technology • Other Classroom Technology • Technical support • Local Area Network/Wide Area Network • Distance Learning Capacity	Early Tech (6–8) points Developing Tech (9–14) points Advanced Tech (15–20) points Target Tech (21–24) points

SOURCE: Texas Education Agency, Capus STaR Chart, Fall 2011.

EXHIBIT 11–4
WISD SUMMARY STaR CHART RATINGS BY CAMPUS
2010–11

CAMPUS	TEACHING AND LEARNING	EDUCATOR PREPARATION AND DEVELOPMENT	LEADERSHIP, ADMINISTRATION, AND INSTRUCTIONAL SUPPORT	INFRASTRUCTURE FOR TECHNOLOGY
A J Moore Academy	Target Tech (23)	Advanced Tech (18)	Target Tech (22)	Target Tech (21)
Alta Vista Montessori Magnet	Early Tech (8)	Developing Tech (9)	Advanced Tech (16)	Advanced Tech (15)
Bell's Hill Elementary	Developing Tech (14)	Developing Tech (14)	Advanced Tech (18)	Advanced Tech (17)
Brazos Middle School	Developing Tech (12)	Developing Tech (12)	Developing Tech (13)	Advanced Tech (15)
Brook Avenue Elementary School	Developing Tech (13)	Developing Tech (13)	Advanced Tech (17)	Advanced Tech (16)
Carver Academy	Advanced Tech (16)	Advanced Tech (16)	Advanced Tech (20)	Advanced Tech (20)
Cedar Ridge Elementary	Advanced Tech (18)	Advanced Tech (19)	Target Tech (22)	Target Tech (21)
Cesar Chavez Middle School	Developing Tech (11)	Developing Tech (12)	Advanced Tech (15)	Advanced Tech (17)
Challenge Academy	Advanced Tech (16)	Developing Tech (14)	Advanced Tech (15)	Developing Tech (14)
Crestview Elementary	Developing Tech (13)	Developing Tech (13)	Developing Tech (14)	Developing Tech (13)
Dean Highland Elementary	Advanced Tech (15)	Advanced Tech (15)	Target Tech (22)	Advanced Tech (19)
Hillcrest Professional Development	Advanced Tech (16)	Advanced Tech (16)	Advanced Tech (16)	Advanced Tech (17)
J H Hines Elementary	Developing Tech (12)	Developing Tech (12)	Developing Tech (14)	Developing Tech (13)
Kendrick Elementary	Advanced Tech (18)	Advanced Tech (17)	Advanced Tech (19)	Advanced Tech (18)
Lake Air Middle	Developing Tech (14)	Advanced Tech (17)	Advanced Tech (18)	Advanced Tech (17)
Lake Waco Montessori Magnet	Developing Tech (12)	Developing Tech (11)	Developing Tech (13)	Developing Tech (13)
Meadowbrook Elementary	Developing Tech (14)	Advanced Tech (16)	Advanced Tech (19)	Advanced Tech (19)
Mountainview Elementary	Advanced Tech (16)	Advanced Tech (16)	Advanced Tech (20)	Advanced Tech (19)
North Waco Elementary	Developing Tech (14)	Developing Tech (9)	Developing Tech (12)	Advanced Tech (20)
Parkdale Elementary	Developing Tech (14)	Developing Tech (13)	Advanced Tech (17)	Advanced Tech (15)
Provident Heights Elementary	Developing Tech (14)	Developing Tech (14)	Advanced Tech (18)	Advanced Tech (18)
South Waco Elementary	Developing Tech (13)	Developing Tech (10)	Advanced Tech (15)	Developing Tech (13)
Stars High School	Advanced Tech (18)	Advanced Tech (17)	Advanced Tech (19)	Target Tech (22)
Sul Ross Elementary	Advanced Tech (16)	Advanced Tech (15)	Advanced Tech (20)	Advanced Tech (20)
Tennyson Middle	Developing Tech (11)	Developing Tech (12)	Advanced Tech (17)	Developing Tech (13)
University High School	Developing Tech (14)	Developing Tech (11)	Developing Tech (14)	Advanced Tech (17)
University Middle	Developing Tech (12)	Developing Tech (12)	Advanced Tech (17)	Developing Tech (14)
Viking Hills Elementary	Developing Tech (13)	Developing Tech (11)	Developing Tech (13)	Developing Tech (13)
Waco High School	Developing Tech (13)	Developing Tech (12)	Developing Tech (12)	Target Tech (21)
Waco ISD Alternative School)	Developing Tech (14)	Developing Tech (12)	Developing Tech (12)	Developing Tech (13)
West Avenue Elementary	Advanced Tech (16)	Advanced Tech (17)	Advanced Tech (18)	Advanced Tech (17)
WISD Average	Developing Tech (14)	Developing Tech (14)	Advanced Tech (17)	Advanced Tech (17)

NOTE: **Exhibit 11–3** provides number range for each of the Levels of Progress.
SOURCE: WISD Campus Summary STaR Chart Report, 2010–11.

Tech status in the former categories when compared to the latter categories. This comparison provides another indicator that WISD staff members are not fully proficient in the use of technology, or consistently integrating technology into classroom instruction.

WISD should develop a comprehensive professional development program to ensure that district staff is proficient in the use of technology. The program should include specific proficiency standards, training requirements, policies, and goals. The program should also include mandatory teacher proficiency levels and timeframes for becoming proficient to ensure all instructional staff have the capability to integrate technology effectively into the teaching curriculum. The director of Curriculum, Instruction and Assessment, the director of Professional Development, and the Instructional Technology coordinators should work as a team to develop the technology professional development program. This team should develop training plans, schedules, and formats to ensure teachers receive training within the target timeframe. The team should also develop an evaluation methodology with measures to objectively assess proficiency that includes an internal certification based on the SBEC Technology Applications Standards. This recommendation can be implemented with existing resources.

TECHNOLOGY PLAN AND COMMITTEE (REC. 50)

WISD lacks an effective comprehensive long-range technology plan. Additionally, the technology plan that has been developed was not created by a planning committee representing all district stakeholders. Both of these items are required by TEA.

Exhibit 11–5 shows WISD's Technology Plan for school years 2011 to 2014, by goal and objectives.

Although the district established a new technology planning committee comprised of broad district representation that met once in September 2011, the existing technology plan was developed by a former Technology Services director with limited input from district personnel other than the Technology Services Department staff. The committee in place at the time of the existing plan development included six Technology Services staff members, the superintendent, the director of Library Services, and the director of Public Information. There were no teachers, principals, students, or community members on the technology planning committee. It is not possible to create a truly comprehensive and beneficial technology plan without input from campus-based stakeholders, as they are the largest group of technology users in a district.

Additionally, the plan does not address some needs of the district. For example, the district's technology plan does not adequately address computer allocation in WISD. In the district profile section, the plan indicates a 10:1 student-to-computer ratio; however, there are no goals or objectives within the plan indicating how WISD will improve this ratio and achieve the state's recommended student-to-computer ratio of 1:1.

In school district technology plans in Texas, TEA requires that the technology budget be broken down in four specific categories of expenditures:

1. Teaching and Learning;
2. Educator Preparation and Development;
3. Leadership, Administration and Instructional Support; and
4. Infrastructure for Technology.

The budget breakdown for WISD's technology plan is presented in **Exhibit 11–6**.

Once the budget is broken down into the four required expenditure categories, each objective in the technology plan is assigned to one or more of these four categories of expenditures. Then, the budget is broken down into three years of related expenditures. In the budget breakdown in the WISD plan, the expenditures by year were broken down into expenditure types, as shown in **Exhibit 11–7**.

The total three-year technology budget is $2,022,000, with 20 percent ($409,298) of budgeted expenditures allocated towards Educator Preparation and Development. Although the total budget of $2,022,000 matches the funding by goal and funding by expenditures tables, there is a disparity of $315,683 between the three-year annual projection for Goal-Educator Preparation and Development (**Exhibit 11–6**: $409,298) and three-year funding dedicated for staff development (**Exhibit 11–7**: $93,615). From **Exhibit 11-7**, it appears that only 4.6 percent, rather than 20 percent, of the total planned expenditures will be spent on staff development.

Comprehensive technology plans include goals, action plans, timelines, performance and success measures, designated staff responsible for implementing and monitoring the goal, project milestones, and financial allocations. Well-written

EXHIBIT 11–5
WISD TECHNOLOGY PLAN GOALS AND OBJECTIVES
2011–14

GOAL	OBJECTIVE
GOAL 1: The District fosters the implementation of state adopted outcomes (such as TEKS) in technology related classroom activities and into electronic instructional delivery (Teaching and Learning).	**OBJECTIVE 1.1**: Implement strategies to meet the expectations for students in the Technology Applications TEKS. **OBJECTIVE 1.2**: Provide access by staff and students to the best available electronic information resources and other appropriate sites. **OBJECTIVE 1.3**: Provide parents and other community members with access to educational resources through the District's computer facilities. **OBJECTIVE 1.4**: Deliver instruction to students using technology integrated into the curriculum. **OBJECTIVE 1.5**: Address specialized technology needs of specific student populations (such as Bilingual, Special Education, or Gifted Talented). **OBJECTIVE 1.6**: Use distance learning to provide educational services and information to students, parents and other community members. **OBJECTIVE 1.7**: Provide support personnel necessary to achieve and maintain efficient and effective level of instructional technology use on campuses.
GOAL 2: The District provides professional development on integrating technology into teaching and learning, instructional management, and administration (Educator Preparation and Development).	**OBJECTIVE 2.1**: Develop strategies to establish technology proficiencies for educators based on the K-8 Technology Application TEKS and SBEC standards for educators. **OBJECTIVE 2.2**: Provide professional development on integrating technology into teaching and learning as well as into instructional management. **OBJECTIVE 2.3**: Provide ongoing technology staff development in the use of technology to accomplish non-instructional tasks. Implement the use of the TEA provided WEB portal titled Project Share.
GOAL 3: The District creates, supports, and promotes data, voice, and video networks which incorporate recent developments in hardware and software (Infrastructure for Technology).	**OBJECTIVE 3.1**: Provide high level of maintenance for the District's installed hardware and network. **OBJECTIVE 3.2**: Create and maintain a wide-area network capable of providing up-to-date data, voice and video connections to the world. **OBJECTIVE 3.3**: Provide up-to-date telecommunication services for all district locations. **OBJECTIVE 3.4**: Provide effective and efficient Internet services. **OBJECTIVE 3.5**: Maintain and upgrade local-area networks for all locations providing up-to-date data, voice and video connections.

EXHIBIT 11–5 (CONTINUED)
WISD TECHNOLOGY PLAN GOALS AND OBJECTIVES

GOAL	OBJECTIVE
GOAL 4: The District promotes the use of technology in planning, decision-making, and communication by internal and external members (Leadership, Administration, and Support).	**OBJECTIVE 4.1**: Address technology needs in campus and district planning activities. **OBJECTIVE 4.2**: Provide electronic communication and collaboration tools to facilitate and support data driven decision making for district goals. **OBJECTIVE 4.3**: Promote the use of standard hardware and software applications for instruction and administrative purposes, such as standardized models of computers and software applications such as eSchoolPLUS. **OBJECTIVE 4.4**: Promote effective and efficient use of technology in all phases of employment.

SOURCE: WISD Technology Plan 2011–14.

EXHIBIT 11–6
WISD TECHNOLOGY PLAN BUDGETED EXPENDITURES BY GOAL
2011–14 (3 YEARS COMBINED)

CATEGORY	BUDGET	PERCENT
Teaching and Learning	$398,908	20%
Educator Preparation and Development	$409,298	20%
Infrastructure for Technology	$1,133,000	56%
Leadership, Administration, and Support	$80,794	4%
TOTAL	**$2,022,000**	**100%**

SOURCE: WISD Technology Plan 2011–14.

EXHIBIT 11–7
WISD TECHNOLOGY PLAN
PLANNED FUNDING BY TYPE OF EXPENDITURES
2011 TO 2013

TYPE OF EXPENDITURE	2011	2012	2013	TOTAL	SOURCE OF FUNDING
Staff Development	$31,205	$31,205	$31,205	$93,615	Local funds (100%)
					Local funds (12%)
Telecommunications and Internet Access	$241,817	$241,818	$185,000	$668,635	E-Rate (88%)
Materials and Supplies	$124,000	$65,000	$124,000	$313,000	Local funds (100%)
					Local funds (12%)
Equipment	$250,000	$250,000	$250,000	$750,000	E-Rate (88%)
					Local funds (12%)
Maintenance	$25,000	$65,000	$65,000	$155,000	E-Rate (88%)
Miscellaneous Expenses	$4,861	$20,000	$16,889	$41,750	Local funds (100%)
TOTAL	**$676,883**	**$673,023**	**$672,094**	**$2,022,000**	

SOURCE: WISD Technology Plan 2011–14.

technology plans lay the foundation for effective planning and decision-making and guide a district toward achieving its stated goals. Complete technology plans draw information from a needs assessment that includes a basic inventory, budget planning, supportive environment for technology use, employee resource allocations, student and staff proficiency levels in technology, and technology purchases.

Boerne Independent School District's technology plan is comprehensive and details their needs assessment along with explicit goals and timelines for incorporating technology into learning and lesson plans, incorporating student usage of technology tools, professional development, technology competency and literacy requirements, administrative technology, and technology replacement cycles. Galena Park Independent School District's technology plan includes a comprehensive training program and technology proficiency standards.

WISD should establish a technology planning committee comprised of stakeholders including administrators, principals, teachers, students, and community members to develop a three-year long-range technology plan with the necessary components to make it a comprehensive and effective management tool.

Development of the district's technology plan should start immediately and should include the following activities:

- Expand the technology plan committee membership to include principals, teachers, students, parents, and community members. The committee should be required to meet twice annually to review progress in accomplishing the goals of the plan and update the plan yearly;
- Review funding and adjust budgets;
- Update technology-related standards, policies, and procedures;
- Review the district improvement plan to determine how technology can support its defined goals and adjust strategies; and
- Review infrastructure upgrades to assist in achieving the state's recommended student-to-computer ratio of 1:1.

This recommendation can be implemented with existing resources.

POLICIES AND PROCEDURES (REC. 51)

WISD's TS Department lacks documented standards, policies, and procedures for technology-related operations. The TS Department has an acceptable use policy and technology recommendation catalog that has recommended hardware and software vendors with model numbers and prices. However, some critical written procedures, such as back-ups; help desk guidelines; email and user account creation; password creation and deletion; and computer inventory, disposal, and donation guidelines are missing. Without adequate policies and procedures in place, WISD staff may implement functions in an inconsistent manner, data or equipment may be damaged or lost, and user services may suffer.

The district's lack of policies and procedures has contributed to data problems in the submission of PEIMS data, and the district is hampered in assessing its hardware and software due to a lack of inventory procedures. In addition, the lack of procedures has made it difficult for incoming staff members to get oriented to their jobs. For instance, in July 2011, the district's Network director resigned. The newly hired director had no written documentation of critical job functions and was required to create them from scratch.

Developing and implementing well-written and organized procedures will help an organization to:

- Protect the institutional knowledge of an organization so that new employees can benefit from the knowledge and experience of skillful former employees;
- Provide the basis for training new employees; and
- Provide a tool for evaluating employees based on their adherence to procedures.

For example, Fabens Independent School District's Technology Department has provided a standard operating procedures (SOP) document on their website. This document provides a list of specific procedures for passwords, e-mail, remote management, equipment repurposing, equipment disposal, equipment checkout, helpdesk, and hardware and software purchases. Providing this information on the district website ensures that all affected employees have access to the information.

WISD should develop and publish a technology-related SOP document. To implement this recommendation, the TS Department should identify and capture the critical processes in areas such as help desk, networking, and application support. Once written, procedures should be reviewed and

approved by the appropriate staff. After approval, newly developed procedures should be posted in a location easily accessible by all technology staff and district users. Keeping the procedures up-to-date is equally important. As the procedures change, each function should be updated in the procedures to reflect those changes.

This recommendation can be implemented with existing resources.

DISASTER RECOVERY PLAN (REC. 52)

WISD does not currently have a comprehensive disaster recovery plan. If a catastrophic event occurred, such as a tornado, flood, fire or vandalism, the district's data would be at risk of loss. In addition to the data loss, the district would not be able to perform important functions, such as student information functions and key business functions, until the original systems were restored.

Although there is no written documentation of this task, the district performs daily backups for all critical systems, and a third party vendor transfers the media (e.g., backup tapes, CDs, etc.) of these backups to a secure offsite location for storage. In one of the high schools, the district has servers that are capable of running the district's student information system if the central office student information system servers fail. The district also owns a diesel generator that is capable of providing power to the district's network operating center, where most of the district networking and server equipment resides. In spite of performing these functions, the district is placing itself at risk by not having a comprehensive, written, and tested disaster recovery plan. For example, the district does not have a designated disaster recovery team, or does not have all the critical information needed during disaster recovery stored in one place.

Important components of a comprehensive disaster recovery plan include: an established disaster recovery team; a written communication plan and procedures (including, but not limited to, a list of contacts such as key vendors and local agencies); a written list of essential hardware equipment; and configuration files and access information, such as passwords. **Exhibit 11–8** includes a summary of essential elements needed for a disaster recovery plan compared to procedures performed in WISD at the time of the onsite visit.

The Glen Rose Independent School District (Glen Rose ISD) developed a comprehensive disaster recovery plan for handling the loss of its information systems. Glen Rose ISD's plan includes emergency contacts for the technology department staff, the district, and software and hardware vendors. The plan includes protocols for both incremental and full recoveries to ensure that the technology staff is knowledgeable in every aspect of the recovery and restoration process. The plan outlines designated alternate sites to recover essential systems, which are dependent upon the type of outage that occurs. The plan also includes system redundancy and fault protection protocols, as well as a tape backup plan.

WISD should develop a comprehensive disaster recovery plan. The plan should include emergency contacts for the TS Department staff, district administrators, and hardware and software vendors. During the planning process the district should classify applications and systems into categories, such as mission critical, critical, essential, and non-critical. These categories indicate how important the application or system is to the district's operation and whether or not the application or system functions can be performed manually. The district should then determine the desired restoration timeframe for each category. Results of these decisions will be the primary drivers of the scope of the plan.

This recommendation can be implemented with existing resources, as the district owns the hardware and equipment necessary for disaster recovery.

DIRECTORY SERVICE (REC. 53)

WISD does not have a districtwide network operating system that provides directory services to all users. Directory services allow a technology department's staff to remotely manage the security of computers through the use of group policies. The group policy feature in directory services enables a network administrator to centrally configure and administer systems, users, and application settings. The group policy can also be used to enable, restrict, and hide system functions and data based on the user's access level.

Many applications use directory services to manage security access to particular functionality in their systems. As part of the implementation of the student information system, WISD deployed Active Directory, a Microsoft Windows directory service, for all student information system users. However, some district users do not utilize directory service. As a result, these users' computers may not be secure, and information and resources on those computers may be subject to unauthorized access. Furthermore, without directory services the Technology Services Department must physically manage individual computers when completing tasks, such as setting up printers and giving access to shared network storage space.

EXHIBIT 11–8
SUMMARY OF ESSENTIAL DISASTER RECOVERY PLAN ELEMENTS COMPARED TO WISD PROCEDURES

STEPS	DETAILS	WISD PROCEDURES
Build the disaster recovery team.	• Identify a disaster recovery team that includes key policy makers, building management, end-users, key outside contractors and technical staff.	• District does not have a designated disaster recovery team.
Obtain and/or approximate key information.	• Develop an exhaustive list of critical activities performed within the division. • Develop an estimate of the minimum space and equipment necessary for restoring essential operations. • Develop a time frame for starting initial operations after a security incident. • Develop a list of key personnel and their responsibilities.	• Key information is available but not stored in one place for easy access.
Perform and/or delegate key duties.	• Develop an inventory of all computer technology assets, including data, software, hardware, documentation and supplies. • Set up a reciprocal agreement with comparable organizations to share equipment or lease backup equipment to allow the division to operate critical functions in the event of a disaster. • Make plans to procure hardware, software and other equipment as necessary to ensure that critical operations are resumed as soon as possible. • Establish procedures for obtaining offsite backup records. • Locate support resources that might be needed, such as equipment repair, trucking and cleaning companies. • Arrange priority delivery with vendors for emergency orders. • Identify data recovery specialists and establish emergency agreements.	• The district has not performed or delegated all the key duties that are described on the detail section of this step.
Specify details within the plan.	• Identify individual roles and responsibilities by name and job title. • Define actions to be taken in advance of an occurrence or undesirable event. • Define actions to be taken at the onset of an undesirable event to limit damage, loss and compromised data integrity. • Identify actions to be taken to restore critical functions. • Define actions to be taken to re-establish normal operations.	• The district does not have a written disaster recovery plan.
Test the plan.	• Test the plan frequently and completely. • Analyze the results to improve the plan and identify further needs.	• This step cannot be accomplished without completion of the previous step.
Deal with damage.	• If a disaster occurs, document all costs and capture the damage by video. • Be prepared to overcome downtime on your own as insurance settlements take time to resolve.	• The district has the knowledge of this step but it is not documented as part of a written disaster recovery plan.
Give consideration to other significant issues.	• Do not make a plan unnecessarily complicated. • Make one individual responsible for maintaining the plan, but have it structured so that others are authorized and prepared to implement it if needed. • Update the plan regularly and whenever changes are made to your system.	• The district has the knowledge of this step but it is not documented as part of a written disaster recovery plan.

SOURCE: Adapted from the Technology and Security Task Force, National Forum on Education Statistics, "Safeguarding Your Technology" Fall 1998; and WISD Interview Notes.

The district should implement a districtwide directory service. The district can supplement the existing directory service that is created with the implementation of the student information system, making implementation faster and more cost effective.

During the review team's onsite visit, the Technology Services Department was in the process of obtaining price quotations from various companies to implement directory services districtwide. Although price quotations will vary, a conservative estimate for implementation of directory services is $50,000. As of March 2012, the district reported that it hired consultants to assist with this project.

WORK ORDER SYSTEM (REC. 54)

WISD does not have an adequate system for managing technology work orders and cannot accurately measure the performance of its technical staff. The district's work order system was developed internally by a district employee. This system does not allow district teachers and staff to create work orders themselves, or to monitor the status of open work orders. Instead, users call or email the help desk staff who then create the work order in the system. Additionally, help desk staff answer inquiries from employees about the status of work orders. Because of the volume of work orders processed each year, the tasks associated with entering, tracking, and managing them are time-consuming and divert help desk staff from their primary responsibility, which is to troubleshoot technical issues. This process also causes frustration for the users, as they must typically wait on hold in order to check the status of work orders. **Exhibit 11–9** shows the number of work orders that have been processed by the technology department over the last four years.

EXHIBIT 11–9
TECHNOLOGY WORK ORDERS BY YEAR
2008–11

YEAR	NUMBER OF WORK ORDERS
2008	3,393
2009	3,416
2010	3,385
2011	3,945

SOURCE: Interviews with WISD staff, November 2011.

The current system has very limited reporting capabilities, therefore the district cannot generate typical work order reports, such as work order completion rate by technical staff, open work orders by technical staff, or average work order closing time by technical staff. These types of reports are critical in helping district management understand the performance and workload of technology staff.

Another important issue with this system is that it does not have adequate security functionality. As a result, any technical staff member can review, edit, and even delete any work order belonging to them or another staff member – without the help desk manager's knowledge or approval.

Typically, school districts utilize a work order system in order to schedule and track the life cycle of work orders. Many modern work order systems are web-based and allow staff to create and monitor work orders via a web browser. Vendors normally provide some built-in reports that are commonly used by technical staff, and can be run by staff based on security access. Additionally, user rights and access are controlled by a role-based security system that is part of the work order system.

The district should acquire a web-based work order system that allows users to report issues, track the status of open work orders, and is capable of providing the district with reports that can be used to measure the performance of technical staff. Subsequent to the review team's assessment of WISD's technology operations, the district acquired a systems management appliance that includes features such as tracking computer inventory and imaging programming. Included in the appliance package is a work order system component. By implementing this component, the district can accomplish this recommendation with no additional cost.

PEIMS PROCEDURE (REC. 55)

WISD lacks processes and procedures to ensure the accuracy of information reported to the Public Education Information Management System (PEIMS). As a result the district had data accuracy issues with dropout rates and attendance rates with the data that they reported to TEA. Correct submission of PEIMS data is essential not only for funding purposes, but for the state's accountability system reporting as well.

Upon discovering data accuracy issues, the district contracted with an external team to perform a comprehensive PEIMS data audit of the district. At the time of this review the audit was not officially concluded, but the district shared the following recommended steps from the ongoing PEIMS audit with the review team (**Exhibit 11–10).**

EXHIBIT 11–10
STEPS RECOMMENDED BY PEIMS AUDIT

ACTION	PRIMARY REASONING
Hire a full time PEIMS coordinator.	Current person who is responsible for PEIMS reporting also oversees the management of all district applications including student information system, finance, human resources system, and more.
Move the new full time PEIMS coordinator under the Student Service Department.	Current person, who is responsible for PEIMS, reports to the Technology Services Department. The Student Services Department is responsible for attendance, truancy, and dropout prevention programs. These factors were the main areas that PEIMS errors came from and where coordination and communication is needed.
Assign a full-time person on each campus as a PEIMS clerk with duties related to PEIMS data entry and reporting only.	Staff were assigned non-PEIMS related duties as a result of the lack of understanding of the job responsibilities.

SOURCE: Interviews with WISD staff, November 2011.

Although these steps will help WISD in addressing their PEIMS data problems going forward, the solution would not be complete without having documented processes and procedures regarding PEIMS data reporting.

Many districts develop and use documented PEIMS procedures outlining data collection, review, verification, error correction, submission, and training requirements to improve accuracy in PEIMS data reporting. For example, Houston Independent School District has a procedures manual for district staff to follow for each of the different PEIMS data submissions. The manual contains directions and easy-to-follow steps for staff to complete queries and submissions accurately and in a timely manner. The manual provides a calendar for submissions, types of submissions, accuracy goals, and posting, editing, and resubmission procedures. Houston Independent School District updates the manual on an annual basis.

WISD's new PEIMS coordinator should develop processes and procedures that encompass all steps necessary to submit error-free data to PEIMS. In addition, the PEIMS coordinator should implement an escalation process to notify senior administrators of PEIMS error rates for each submission to the state. This process should ensure that the district places the proper importance on accurate PEIMS reporting. The PEIMS coordinator can develop processes and procedures with existing funds.

DEVELOP PURCHASING PROCEDURES FOR TECHNOLOGY PROCUREMENT (REC. 56)

WISD's technology standards for the purchase of technology-related items are not always enforced. As a result, many schools have acquired hardware and/or software items that do not conform to district technology standards, in some cases rendering the items unusable.

The district's Purchasing Manual states that "all technology related items and equipment must be approved by the Technology Department prior to purchase." This is accomplished through the district's automated purchasing system which requires users to input approved routing codes to electronically send a purchase requisition to the Technology Services department for review. When a requisition is routed to Technology Services, staff reviews proposed purchases to ensure that they conform to district technology specification, that the proposed purchase is compatible with existing technology, and that Technology Services staff can support the purchase.The review team learned, however, that the Technology Services Department often approves purchases of items that do not conform to standards or that they cannot support.

The review team identified several problems related to the purchase of non-standard technology, including equipment and software for which the district cannot provide support and equipment that is not used because no one knows how to use it.

In interviews with staff and site visits to schools, the review team was provided with inconsistent information about the purchase approval necessary to obtain technology. For

instance, one school principal said that her request for mobile devices for teacher use was denied through the purchase requisition process. However, a staff member at a different school told the review team that the same devices were purchased for her campus. During one school visit, the review team was shown digital video equipment that was purchased using grant funds, but this equipment had never been used in the classroom because staff did not know how to operate the equipment. Further, when campuses purchase classroom technology equipment that is not standard, teachers as well as students can be trained in the use of one type of equipment, but find that they need additional training when they transfer to a school that uses a different type of equipment.

The district's Purchasing Manual details procurement procedures for credit card purchases, professional services procurement, and fixed asset purchases; however, detailed procedures for making technology purchases are not included in the manual, stating only that "all technology related items and equipment must be approved by the Technology Department prior to purchase."

The Technology Services director and the director of Purchasing should coordinate to establish detailed procedures for the procurement of technology software and equipment to ensure that purchases conform to the district's technology standards. The procedures should address technology standards as well as which items must obtain special approval before they can be purchased. The new procedures should then be included in the Purchasing Manual, and all employees provided training on the procedures. Furthermore, all Technology Services staff responsible for approving purchase requests should be trained on the district's technology standards so that they can adequately approve or deny requested items.

This recommendation can be implemented with existing resources.

FISCAL IMPACT

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

RECOMMENDATION		2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
49.	Develop a comprehensive professional development program to ensure that district staff is proficient in the use of technology.	$0	$0	$0	$0	$0	$0	$0
50.	Establish a technology planning committee comprised of stakeholders from administrators, principals, teachers, students, and community to develop a three-year long-range technology plan with the necessary components to make it a comprehensive and effective management tool.	$0	$0	$0	$0	$0	$0	$0
51.	Develop and publish a technology-related standard operating procedures document.	$0	$0	$0	$0	$0	$0	$0
52.	Develop a comprehensive disaster recovery plan. The plan should include emergency contacts for Technology Services Department staff, district administrators, and hardware and software vendors.	$0	$0	$0	$0	$0	$0	$0
53.	Implement a districtwide directory service.	$0	$0	$0	$0	$0	$0	($50,000)
54.	Acquire a web-based work order system that allows users to report issues, track the status of open work orders, and is capable of providing the district with reports that can be used to measure the performance of technical staff.	$0	$0	$0	$0	$0	$0	$0
55.	Develop processes and procedures that encompass all steps necessary to submit error-free data to the Public Education Information Management System.	$0	$0	$0	$0	$0	$0	$0
56.	Establish detailed procedures for the procurement of technology software and equipment to ensure that purchases conform to the district's technology standards.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 11		**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**($50,000)**

CHAPTER 12

SAFETY AND SECURITY

WACO INDEPENDENT SCHOOL DISTRICT

CHAPTER 12. SAFETY AND SECURITY

The safety and security of a school district is intertwined with the safety and security of the surrounding community. Schools can be a haven for students, but crime and community factors that contribute to crime are not left at the schoolhouse door. A safe learning environment requires focus on security operations, safety programs, and student discipline. Programs for prevention of crime, intervention in areas at risk for crime, and enforcement of laws that protect victims of crime are essential. Safe schools are a community effort requiring the cooperation of local governments, community and business leaders, and citizens.

Waco Independent School District (WISD) is located primarily in the city of Waco, a growing community in central Texas. With 15,240 students and 32 schools, WISD is the largest school district in McLennan County. The WISD Board of Trustees (board) commissioned its own police department and set its jurisdiction at the boundaries of the district as well as any district property that may be located outside of district boundaries. The primary duty of WISD police officers is to protect the safety and welfare of any person within the jurisdiction or on district property. Officers have authority to enforce both school regulations and criminal laws on district property, in areas adjacent to district property, and on district school buses. The district requires administrators to report all crime or suspicion of crime that occurs on school grounds.

State statutes require school districts to adopt a student code of conduct that provides students and parents with expectations for student behavior and consequences for violation. Violations range from ignoring the dress code to possession of drugs. Students who engage in serious misconduct must be removed from the classroom and placed in Disciplinary Alternative Education Programs (DAEP). Discipline alternatives may include suspension from a class or program at the student's school or to a district provided alternative school. WISD provides a structured DAEP for junior high and high school students and a separate DAEP structured for elementary students. In 2010–11, 94 percent of WISD's discipline was for violations of the student code of conduct.

In counties over 125,000 in population, school districts and juvenile justice agencies must establish a Juvenile Justice Alternative Education Program (JJAEP). The JJAEP is under the jurisdiction of the newly created Texas Juvenile Justice Department and provides for the education of students expelled from the regular classroom setting. WISD serves as the fiscal agent for the McLennan County JJAEP and assumes responsibility for supervision of staff and daily operations.

The district is making an effort to manage discipline at the home school, which is reflected in the reduction of repeat offenders from the district's DAEP. Principals have been given the flexibility to establish in-school disciplinary programs that address chronic violators and students returning from disciplinary alternative programs. Principals are also accountable for student success even when referred to the DAEP or the JJAEP.

WISD has also applied for and received a grant from the Texas Governor's Office that provides funding for a multi-component program designed to reduce misconduct and subsequent referrals to disciplinary alternative programs. The grant trains student ambassadors in mediation and mentoring of fellow students, provides for community-based justice through a teen court, and diverts students from criminal court to programs that include both parents and students in behavior and communication based classes. The grant programs started in 2011–12 and are in the implementation stage.

ACCOMPLISHMENTS

- WISD has implemented changes to its DAEP, and while it is still early, the results are promising with a significant reduction in recidivism in the DAEP.
- The district has a comprehensive outreach program which connects students in shelters with school services, reducing the impact of homelessness on educational opportunities.

FINDINGS

- WISD has not fully developed external relationships that collaboratively work to reduce the impact of community justice issues on the district.
- WISD's behavior management approach lacks guidance on acceptable punishment, consistency in application of intervention programs, and assessment

of operational factors affecting student conduct, which contributes to a high number of disciplinary referrals and removal of students from the optimum learning environment for minor infractions.

- WISD lacks programmatic performance goals, performance evaluation against goals, and clear lines of authority for the district's truancy reduction and dropout recovery program.
- WISD lacks a clearly defined process for identifying and resolving safety and security issues across district departments leaving accountability gaps in identifying, prioritizing, budgeting, and addressing safety issues.

RECOMMENDATIONS

- **Recommendation 57: Engage area leadership in developing solutions to juvenile misbehavior by leveraging both school and community resources in a collaborative, targeted plan.**
- **Recommendation 58: Develop a multi-faceted approach to student misconduct that identifies and addresses operational impacts, distinguishes consequences for minor conduct infractions from penalties for major violations of law, creates consistency in intervention services, and provides for ongoing evaluation and implementation of successful programs that address obstacles to appropriate conduct.**
- **Recommendation 59: Clarify roles and responsibilities in the attendance program and develop procedures for assuring accountability for performance from all participants.**
- **Recommendation 60: Expand the duties of the core safety team from crisis management to districtwide oversight of safety programs that includes coordination of planning, prioritizing, and scheduling implementation of recommendations.**

DETAILED ACCOMPLISHMENTS

REDUCING RECIDIVISM IN DAEP

WISD has implemented changes to its DAEP, and while it is still early, the results are promising with a significant reduction in recidivism in the DAEP. In developing its improvement plan, the district included several performance objectives specific to improving student conduct. Goals for the program include improvements to classroom management techniques and reduction in the number of students returning with repeat violations. These goals have resulted in the development of a different program structure to serve the educational and behavioral needs of district students.

In developing its new DAEP approach, principals visited several districts to get ideas and explore successful practices. The Waco Alternative Campus DAEP is developed around a system of positive and negative consequences for behavior. Students have to earn trust by showing they can manage behavior according to expectations. For example, the school has "no-talking" zones which test self-control, and students must eat lunch at his or her desk until earning the privilege of eating in the cafeteria with friends. Violations of school rules are addressed immediately, linking conduct and consequences when memories of the event are fresh.

Parents meet with administrators, and receive expectations for their children while in the program. The minimum assignment is 45 days for lesser infractions and 60 days for major violations. Students can exit the program earlier if merited. Students have a performance card that must be signed each class period. Teachers note behavior and other student efforts on the card. At the end of the week, staff reviews the cards and students are rewarded if behavior merits it.

The DAEP is designed on the home school model. Teaching staff is expected to provide engaging lessons similar to home school, with a minimum use of worksheets. The DAEP curriculum for core subjects aligns with the district curriculum so students can be on track with core subject classes when returning to their home school. If the home school allows, DAEP staff keep in touch with students transitioning back, providing additional resources to support the student's success.

The program focuses on the conduct that resulted in the placement and strategies for not repeating that behavior. The school is staffed with a behavioral specialist and provides class time for discussing conflict resolution strategies, effective communication, and anger management. The percentage of repeat offenders reduced from 46 percent in 2009–10 to 12.8 percent in 2010–11. The reduction goal for school year 2011–12 is 6 percent.

CONNECTING WITH HOMELESS STUDENTS

The district has a comprehensive outreach program which connects students in shelters with school services, reducing the impact of homelessness on educational opportunities. Federal law requires schools to eliminate barriers to educational success, including obstacles to enrollment and attendance. For homeless students, barriers may include reliable transportation to or from after school events, or money to pay extracurricular participation fees. Schools have discretion in determining how to address barriers. WISD has developed a comprehensive approach to connecting homeless students with educational opportunities.

School staff initially identifies students without a permanent address during enrollment. The district includes a residency form in every registration packet. School staff also receives training to recognize answers that would qualify a student for additional support, such as graduation assistance and extracurricular activity fees, and then refer the student for services. Area service providers are also made aware of the homeless student outreach program and will contact the district when a new homeless arrival applies for social services. This allows the district to make immediate contact with the student, rather than wait for the family to initiate contact.

The homeless outreach program is designed to minimize the number of places a homeless family must go to get educational support services. WISD goes to area homeless shelters to register students, rather than waiting for families to register at school. The district also provides student transportation to and from school directly to area shelters.

In addition to services that bring students to district schools, WISD provides educational assistance to the students at the shelter location. Working with the shelter's schedule, WISD provides tutoring services to district students. By providing tutors in the living environment, tutoring is more accessible and can provide a stronger impact on student learning. The shelter connection program has an average of 30 students, keeping homeless students connected to education during a period in their life when maintaining connections can be challenging.

DETAILED FINDINGS

INCREASE COLLABORATION FOR COMMUNITY-WIDE SOLUTIONS (REC. 57)

WISD has not fully developed external relationships that collaboratively work to reduce the impact of community justice issues on the district. The Waco community recognizes the need to address the impact of poverty on its juvenile population, but WISD has not engaged the range of local entities that have expressed a willingness to help. District staff is taking up the shortfall by assigning its own resources to address community issues that affect the education process, and is missing opportunities for developing solutions that maximize district and community resources.

The district has many individuals and businesses that work with the district and participate on various internal district committees. However, these resources are not provided as part of a collaborative WISD and community plan, but are individual efforts developed to address a specific need, frequently at a single school. The district does not have a coordinated process for engaging community leaders who are addressing juvenile issues similar to those experienced by the district.

WISD is a member of the Heart of Texas Council of Governments (HOTCOG), which provides a forum for local government leaders to collaborate on community solutions. The organization includes local governments in a multi-county area. In order to receive grant funding from the Criminal Justice Division of the Governor's Office, each county is responsible for developing a community justice plan. The intent of the plan is to identify issues, needs, and gaps in service affecting law enforcement, juveniles, and victims.

The HOTCOG plan for McLennan County identified 13 juvenile justice issues that need community resources toward a collaborative solution. Many of the problems identified in the community plan directly affect WISD, or are concerns WISD has also identified as district issues. Some of WISD's issues include:

- Need to increase parental involvement; Need for intervention services after problem identification.
- Need to have focused engaged students.
- Need for intervention services to service special populations.
- Need to connect students in need with available services.
- Need to address truancy by addressing root causes influencing attendance.

An example of how WISD's issues link to the HOTCOG plan: *WISD needs focused and engaged students for effective learning*. The ability of a student to focus and engage in the

educational process can be impacted by substance use or abuse. The HOTCOG plan identifies substance abuse as the second highest juvenile priority for the community. In interviews district staff disagreed on the extent to which drugs were affecting district schools, but agreed that drugs were used by some students. Staff said district drug issues are primarily addressed through individual student counseling with little effort on drug prevention education districtwide. The HOTCOG plan identifies reduction of drug use as a community goal, and the WISD Police Department, the Waco Police Department, and the McLennan County Sheriff's Office have officers trained to teach drug resistance education. The district does not have student drug prevention programs, resulting in a missed opportunity for collaboration to address both a district and community concern.

Although WISD staff does not agree on the extent to which drugs are in district schools, staff believes that substance abuse problems in the community have an impact on students. The district did not renew its contract for the K-9 drug sniffing dog program. The program was initially budgeted through the federal program "Drug Free Schools and Communities." According to district staff, when the Student Services Department was not staffed, the police department maintained the program until the K-9 vendor terminated the contract. The new Student Services Director said that there has been discussion of using the K-9 services again. However, the original funding for the program is no longer available so the district would have to allocate funding for the program.

According to WISD, of the discipline incidents in 2010–11, only 0.18 percent were for drug or alcohol related offenses, suggesting that the drug dogs may have had a deterrent effect on students bringing drugs on school grounds. When asked about the lapsed contract, district police were uncertain of their authority to extend a district contract for contraband location services beyond school property to offsite areas where drugs could be hidden and easily accessed by students. WISD has not engaged the Waco Police Department or the McLennan County Sheriff's Office to work on a solution, although student drug use is a shared concern and both agencies have drug-sniffing dogs and jurisdiction in the areas believed to provide hiding places for student contraband.

Another example of opportunities for collaboration exists with the district's truancy and dropout efforts. Both WISD and the community are concerned about student attendance. McLennan County has several courts with truancy jurisdiction. When a student has repeating absences that meet standards for court intervention, WISD staff drafts court complaints, files cases, and tracks compliance with court orders. Only one court has developed a truancy docket that attempts to address the number of cases in WISD schools. In 2010, Justice of the Peace Precinct 8 disposed of 2,981 cases. The justice court with the next highest disposition number was 439, the third highest was 61. Constables who service the Justice of the Peace courts typically do not serve court process on WISD truancy cases, but rely on the WISD police to serve their court papers and transport juveniles to the court. According to district staff, there are no prosecutors specifically assigned to the truancy caseload or truancy reduction strategies.

Both WISD and the criminal justice community recognize the need for more family intervention services and have goals for increasing family support and participation. Local courts have access to intervention services and programs not otherwise available to the district. In 2010–11, WISD filed only seven percent of the cases meeting the statutory definition of a truancy crime. If WISD filed a substantial percentage of cases meeting the legal threshold the system, with its limited court availability, could be overwhelmed. Although only seven percent of possible WISD cases are filed, the size of the truancy docket has raised community concerns for the number of persons crowding into the Precinct 8 courtroom, but families who need court intervention services to get back on the attendance track are also affected by lack of system-wide collaboration.

Rather than engage local officials, WISD has shouldered both the school related workload and a portion of the court's case management workload. The WISD Police Department has absorbed truancy related workload from other law enforcement agencies. WISD has approximately 35 percent of McLennan County's school-aged population and a truancy caseload in local justice courts that exceeds 1,000 cases, making collaboration between the district and other government service providers essential for successful reduction strategies. WISD does not sit on the planning team for the community plan, missing an opportunity for collaboration and problem resolution with agencies sharing the same goals and compatible responsibilities.

The Office of Juvenile Justice and Delinquency Prevention issued guidelines for successful prevention programs that include the following principles:

- Prevention efforts require both public agencies and a dedicated community coalition of citizens and businesses.

- The program must operate under a comprehensive plan, which periodically assesses and prioritizes the risk factors in the community associated with the development of delinquent behavior, and implements strategies to address the prioritized risk factors.

There are many school district and community programs throughout the state that serve as potential models for local community collaboration. The Texas Education Code Section 37.212 promotes community cooperation through the Texas School Safety Center. The center was created through legislation to provide advice and tools for increasing safety in Texas schools. The legislation recognizes the importance of community collaboration in keeping students safe by codifying cooperation at the state level. The statute requires the center to promote cooperation between state agencies, higher education institutions and juvenile delinquency councils, setting a standard that can be applied at the local level.

WISD should engage area leadership in developing solutions to juvenile misbehavior by leveraging both school and community resources in a collaborative, targeted plan. WISD should start by identifying the most important issues needing a coordinated solution. District staff should research successful programs that address those issues and outline a basic plan of action. The Office of Development and Community Partners should review current community resources to determine if current partners could play a role in the plan, or if new partners should be solicited. Staff should present plans to the board for additional input or suggestions.

Exhibit 12–1 outlines issues of importance to the district, the associated issue recognized in the McLennan County Community Plan, and examples of collaborative opportunities.

The superintendent should arrange an initial meeting with local agency policymakers to discuss the plan, get additional ideas for plan improvement and implementation, and determine if the local agencies are interested in participating. If interested, a detailed plan should be developed that includes meaningful and measurable goals and assigns roles and responsibilities to the components of the plan.

Resource allocation to the plan should provide for efficiency in services with goals of minimizing duplication of effort or closing service gaps. Statutory funding mechanisms should be engaged when available to address components of a community-wide solution, such as the adoption of a case manager fee assessed on fine only criminal convictions under Code of Criminal Procedure Article 102.0174, fees for teen court programs, funds for school safety programs associated with traffic offenses, or forfeited funds set asides for drug and alcohol treatment under Chapter 59 of the Code of Criminal Procedure. WISD should also request participation in the McLennan County Community Plan as an additional point of communication and resource collaboration on issues that affect both WISD and the community.

This recommendation can be accomplished with existing resources.

STUDENT MISCONDUCT MANAGEMENT (REC. 58)

WISD's behavior management approach lacks guidance on acceptable punishment, consistency in application of intervention programs, and assessment of operational factors affecting student conduct, which contributes to a high number of disciplinary referrals and removal of students from the optimum learning environment for minor infractions.

The state of Texas requires school districts to punish certain types of student misconduct by placement in a disciplinary alternative program. These programs are either a district provided DAEP or a county operated JJAEP. School districts also have the discretion to assign students to these programs for misconduct that is less serious than the mandatory referral offenses. According to the Texas Education Agency's (TEA) Academic Excellence Indicator System (AEIS), in 2010–11, at 5.7 percent WISD's students with discipline incidents are higher than the state average of 1.9 percent. To the extent that behavior requires correction but not punishment, how a district manages student conduct can affect how the community perceives the safety of a school or district.

For purposes of this review, four districts with similar characteristics were selected as WISD's peers to be used for comparisons. **Exhibit 12–2** compares WISD's disciplinary placements to its peers: Tyler ISD, Bryan ISD, Donna ISD, and Harlandale ISD.

As shown in **Exhibit 12–2**, WISD had the highest percentage of discretionary referrals to the DAEP at 5.87 percent and to the JJAEP at 1.23 percent. The next closest peer in discretionary DAEP assignment is Harlandale ISD with 4.33 percent. At 0.24 percent, Bryan ISD has the second highest percentage of discretionary JJAEP placements, but is almost a percentage point lower than WISD in this category. While the differences may seem slight, when considering that the numbers represent students separated from their home

EXHIBIT 12–1
POTENTIAL ISSUES FOR COLLABORATIVE SOLUTIONS
2011

DISTRICT ISSUE	RELATED COMMUNITY PLAN ISSUE	POTENTIAL COLLABORATIVE SOLUTIONS
Need to increase parental involvement; Need for intervention services after problem identification.	Need for intensive family intervention.	WISD can work with community agencies to expand parenting and communication workshop attendance. The district's cable television station can be used to develop on air programming, or promote attendance at events. Area churches providing poverty support programs can coordinate with the district to reduce risk of gaps in available services, or focus multiple resources on the areas of highest need.
Need to have focused engaged students.	Substance abuse.	WISD has potential for early identification before criminal engagement. For example, staff may smell marijuana on a student without having proof of ingestion. Criminal justice agencies may collaborate in early warning system for parents with offers to connect students with counseling programs.
Need for intervention services to service special populations.	Need for juvenile mental health services.	WISD has a School Health Advisory Council and a Special Education Department with interests that may align with juvenile court processes or county health and human services for early identification and connection with services.
Need to connect students in need with available services.	Lack of communication of available programs to the public; Need for transportation for juveniles and their families for services.	Schools are located throughout the county and can provide a location for neighborhood-based services. For example, truancy court could be held at schools in areas having the highest number of truant students. Social service agencies could establish similar outreach programs. Information on services could be printed on flyers, posted on school bulletin boards, and sent home in backpacks.
Need to address truancy by addressing root causes influencing attendance.	Limited job opportunities for youth.	Students without sufficient family financial resources may be in need of part time employment. WISD has expertise to provide skills-based training on obtaining and keeping a job, and work collaboratively with agencies and businesses willing to provide work opportunities that do not conflict with school schedules so long as the student is attending school.

SOURCE: WISD staff interviews, McLennan County Community Plan, 2011.

EXHIBIT 12–2
WISD COMPARISON OF DISCIPLINARY REFERRALS TO PEER DISTRICTS
2009–10

DISTRICT	STUDENT POPULATION	PERCENT DISCRETIONARY DAEP PLACEMENT	PERCENT DISCRETIONARY JJAEP PLACEMENT*
Harlandale ISD	14,454	4.33%	0.17%
Donna ISD	14,870	1.68%	0.03%
Waco ISD	**15,254**	**5.87%**	**1.23%**
Bryan ISD	15,536	1.58%	0.24%
Tyler ISD	18,344	1.45%	0.00%

*The percent of discretionary JJAEP placements vary based on the memorandum of understanding agreement between the districts and the county as to how these placements will be used for the program.
SOURCE: Texas Education Agency, Public Education Information Management System (PEIMS), 2009–10.

school, friends, and extracurricular activities the potential for impact on a struggling student can be significant.

In order to reduce the disciplinary numbers, the district is focusing on discipline management in the classroom, providing training and tools to school staff. The district has provided training in CHAMPs™ (Conversation, Help, Activity, Movement, Participation), which focuses students on responsible behavior in the learning environment; Lead your School™, which focuses staff on classroom leadership through engaging lessons; and Behavioral Response to Intervention, advocating a full spectrum of support in solving behavioral problems. Principals enforce the new philosophy by monitoring office referrals and making recommendations for improvement when a pattern of weak classroom management emerges.

Although WISD is addressing classroom management, which is an important factor in disciplinary referrals, the district has other factors which contribute to the higher level of disciplinary events. Application of discipline philosophy to individual behavior circumstances, programmatic consistency in intervention efforts, and enforcement staffing and deployment choices also affect district efforts to manage student behavior.

DISCIPLINE PHILOSOPHY

Student disciplinary actions are affected by a district's philosophy on assigning consequences for misbehavior. Removal from the regular classroom as punishment for misbehavior removes students from teachers with subject matter expertise. For a potentially struggling student, these periods away from a regular classroom setting may contribute to further disengagement from the educational setting.

The district has a code of conduct, and consequences for its violation includes removal to an in-school suspension (ISS) program, out-of-school suspension (OSS), or removal to a DAEP. WISD's adopted student code of conduct sets expectations for behavior, lists techniques for addressing student conduct, and instructs on statutory penalties for serious misbehavior. The staff member assessing discipline determines if the circumstances merit as little as verbal correction or as much as expulsion. Complaints about consistency or appropriateness can be appealed to the senior director of Student Services.

Exhibit 12–3 shows the district's disciplinary incidents for violations of the student code of conduct and for serious or persistent misbehavior. These categories report behaviors that do not meet another more specific category such as fighting, unless it is a repetition of that conduct. Because persistent misconduct includes repeat behavior, code of conduct violations that do not rise to the level of JJAEP assignment

EXHIBIT 12–3
WISD DISCIPLINE FOR SERIOUS/PERSISTENT MISCONDUCT AND CODE OF CONDUCT VIOLATIONS
2007–08 TO 2009–10

	2007–08	2008–09	2009–10
DISCIPLINE FOR INCIDENTS OF SERIOUS/PERSISTENT MISCONDUCT			
In-School Suspension	13	52	8
Out of School Suspension	130	227	61
DAEP Assignment	136	47	110
JJAEP Assignment	187	193	185
TOTAL	**466**	**519**	**364**
DISCIPLINE FOR INCIDENTS OF CODE OF CONDUCT VIOLATIONS			
In-School Suspension	17,868	15,645	17,016
Out-of-School Suspension	5,979	5,641	5,929
DAEP Assignment	500	629	535
JJAEP Assignment	N/A	N/A	N/A
TOTAL	**24,347**	**21,915**	**23,480**
TOTAL INCIDENTS	**24,813**	**22,434**	**23,844**

SOURCE: Texas Education Agency, PEIMS, 2007–08 to 2009–10.

individually, could rise to the level of JJAEP assignment collectively.

As seen in **Exhibit 12–3**, code of conduct violations dropped in 2008–09, but increased slightly in 2009–10. Of the total incidents, the percentage of suspensions for minor code violations remains relatively consistent at 98 percent, with only 2 percent assigned to the DAEP each year during the three-year period. In 2009–10, 30 percent of discipline incidents for serious/persistent misconduct were referred to the DAEP, and 51 percent were referred to the JJAEP.

Variations in frequency of assigned discipline in different years can be attributed in part to the discipline management philosophy of the staff assessing the discipline. With the exception of statutory removal mandates, the WISD code of conduct does not provide for penalty ranges for types of misconduct, nor does the district provide other written guides to staff on assessing punishment for behavior that does not require mandatory removal. According to staff, students have been referred to disciplinary alternative programs for rudeness and inappropriate language. Although the number of referrals to the JJAEP for insubordination has decreased, a student who is repeatedly rude can still be referred to the program designed for students with serious criminal charges.

The district's past philosophy of removing troublesome students for rude or insubordinate conduct has been aided by the current JJAEP arrangement. By state law McLennan County is responsible for providing the JJAEP for students committing certain serious criminal offenses in districts within the county. The state reimburses the county at a rate of $79 per student per attendance day. In McLennan County, WISD through a memorandum of understanding (MOU) agreement with the county provides the JJAEP program, acting as the fiscal agent for McLennan County and providing the facility, teachers, support staff, and utilities. The county passes state funding through to WISD for mandatory student placements in the JJAEP. The remainder of discretionary placements from WISD or other school districts in McLennan County is paid for by the school that sends the student. In some counties, a county run JJAEP will not take discretionary referrals. As the provider of the McLennan County JJAEP, WISD controls the resource for student placements making discretionary referrals for minor but persistent misconduct a more accessible option.

CONSISTENCY IN BEHAVIOR MANAGEMENT

WISD provides behavior management and intervention services, but it is not consistent in how and how long programs are applied. Behavior programs provided at the individual school level may not continue as students move between schools. Districtwide programs may not have continuing, consistent application.

For example, the district established Student Assistance Teams (SATs) to identify and provide early intervention services that address root causes of student academic or behavioral failure. Students that are below grade level for their age, or below grade level in reading, may act up to avoid the difficulties encountered in class. WISD's discipline of students for persistent misbehavior, even if minor, has resulted in removal from the classroom setting to a disciplinary setting. The principal of the WISD Alternative Campus (serves as the DAEP) said staff recognizes that some students referred for misconduct are reading below grade level, and the staff attempts to get students on grade level in the short time students are in the program. However, the DAEP does not have a protocol for making sure continuing deficiencies are addressed when the student returns to the home school, and has encountered some school resistance in following up with the student who is transitioning back to his or her regular classroom setting.

Although the SAT provides intervention services before and after a student is sent to a disciplinary program, it has not established processes that ensure consistency in service when a student is performing below grade and moving between the home school and alternative educational programs. Without smooth transitions, these students may further disengage from school leading to continued behavior problems.

As another example, WISD has had dispute resolution programs provided by community volunteers at different times, but has not implemented them consistently throughout the district's target population. The district is now piloting a grant funded program that trains students on mediation of disputes, communication, and problem-solving. The pilot is in its first year of implementation and is funded for three years, but even if successful, continued success requires consistent application beyond the pilot.

In 2011, WISD also provided programs on working with special student populations. In interviews, staff said that the district had provided similar behavioral programs in the past, but without consistent application. Until the principles

become second nature for both students and staff, the district does not see full value for the efforts.

STAFFING IMPACTS ON DISCIPLINE

WISD staffs its schools with both police officers and security guards. Fifteen guard positions are assigned primarily to high schools and middle schools. These positions perform traditional security functions such as walking school grounds and parking lots, but they also monitor hallways, escort misbehaving students from classrooms to the office, escort students to the bathroom, and monitor gathering areas during student lunch periods. Many of the responsibilities are not typical guard duties, but are tasks that assist and sometimes relieve teachers and school administrators from student behavior oversight. Because these positions are security positions and not educational positions they do not receive training on student behavior management.

WISD has its own police department, staffed with 13 certified peace officers. The officers patrol hallways and grounds and provide a visible deterrent to misbehavior. Officers also investigate potentially criminal incidents, making arrests or issuing citations if circumstances provide probable cause to believe a crime has occurred. WISD police officers are assigned to secondary schools as resource officers, and a roving patrol unit responds to calls for service from elementary schools. School police receive training in working with juveniles and in juvenile law. Resource officers are assigned for law enforcement, but school staff may occasionally call upon them for other tasks such as intervening in a classroom behavior incident.

Once a peace officer is called to an incident, the officer's duty is different from that of a teacher, administrator, or security guard. The duty of a peace officer is to suppress crime by arresting offenders and taking them before a magistrate. For certain misdemeanors, a peace officer does not have to arrest, but can issue a citation to the offender to appear in court. A review of WISD police citations show traffic crimes comprise approximately a third of all citations written, and Disorderly Conduct-Fighting citations comprise another third.

Having school police officers contributes strongly to a safe school by providing rapid response to emergencies and stronger consequences to criminal conduct. School district peace officers address delays in response time from local police departments who may be answering other service calls in the community. Because administrators are expected to call if criminal activity is suspected, and because peace officers file charges when confronted with criminal activity, the number of reported offenses will be affected by the availability of officers and the district reporting policy.

If student misconduct is also a criminal act, even if it is a minor crime, the administrator's decision to involve district police adds a different level of consequences to the misconduct.

When enforcement staff is added to any organization, violations rise from the fact that more persons are looking for conduct violations. Once a staff observes a violation, it must be addressed. A review of disciplinary incidents reported by WISD in PEIMS from 2007–08 to 2009–10 shows code of conduct violations are substantially higher than serious/persistent misconduct, comprising on average 98 percent of the general violations that are not reported in a specific category of misconduct such as criminal trespass, fighting, or drug possession. In interviews, district staff said the majority of misconduct occurs in only 10 percent of the student population. A review of WISD disciplinary reports for 2010–11 shows that 14 percent of the student population had three or more disciplinary actions, indicating staff were reasonably accurate in identifying the students with continued misconduct. It also indicates the student population percentage that district security resources are deployed to manage.

In 2010–11, WISD spent $118 per student on security and monitoring services. The closest peer in general fund costs per student is Donna ISD at $115. Tyler ISD and Harlandale ISD spends $93 and $90 respectively. Bryan spends the least, at $39 per student, but does not have a district police department. WISD, Donna ISD, Tyler ISD, and Harlandale ISD have district police departments. The three highest spenders, WISD, Donna ISD, and Tyler ISD, also use security staff in schools. As security staff adds cost, deployment can provide a reasonable return on the expenditure for enforcing the student code of conduct.

Correcting behavior learned outside of the school environment takes commitment. Studies on effective behavioral programs find different approaches are needed to address different issues brought by each child. While suspension and other serious penalties may be appropriate for serious misconduct, educational research has linked negative outcomes to suspension and expulsion from schools, including lower scores districtwide on standardized tests.

WISD should develop a multi-faceted approach to student misconduct that identifies and addresses operational impacts, distinguishes consequences for minor conduct infractions

from penalties for major violations of law, creates consistency in intervention services, and provides for ongoing evaluation and implementation of successful programs that address obstacles to appropriate conduct. **Exhibit 12–4** provides examples where a multi-faceted approach can address contributors to student misconduct and high disciplinary referrals.

WISD has already made positive changes toward addressing disciplinary issues, but needs to evaluate factors contributing to the high number of disciplinary incidents. Districts that evaluate factors contributing to high number of disciplinary incidents provide guidance to staff that distinguishes between consequences for minor violations of the Student Code of Conduct and punishment for serious offenses. Removal of a student from the optimal learning environment is punishment and is reserved for more serious offenses or for chronic misbehavior not addressed by intervention services or other corrective action. Not all conduct is reduced to a potential consequence, but districts provide guidelines to principals for consistency in discipline across the district.

WISD should evaluate successful behavior based programs and develop a process for expanding them where appropriate to meet the needs of a target population. The Development and Community Partnership Department should track performance measures and explore the possibility of recreating the program in additional schools if a community partner initiated or participated in the program. Principals should be accountable for reinforcing successful program application until the district sees a return on its investment in the program.

Chronic misbehavior sufficient to initiate early intervention services should be defined and staff notified of protocols that trigger a SAT review. If not already receiving SAT services, students in disciplinary placements who are below grade level in basic skills such as reading should be matched with a SAT member upon returning to the home school, and an individualized plan for remediation should be developed as part of the transition plan from the DAEP or JJAEP. The DAEP should continue to communicate with the SAT until satisfied that the student has made a successful transition.

Finally, WISD should determine if current operational assignments that result in security reports of minor infractions are necessary. The district use of security guards is mainly for monitoring student behavior. WISD should have an appropriate number of enforcers for the district's discipline philosophy, but as the district's new philosophy is fully implemented the need for security guards should decrease. To the extent that a school has a need for security over and above the certified peace officers assigned to the school, the security positions should receive training in proper handling of minor violations consistent with the district's philosophy on behavior management. The district has eight secondary schools and should be able to reduce the number of security guards to one per school at the middle schools, and two per school at the high schools in the next two years. Additional reductions should be evaluated with the effectiveness of district behavior and intervention programs.

EXHIBIT 12–4
AREAS OF IMPROVEMENT FOR LESS SERIOUS MISCONDUCT AND RELATED DISCIPLINE
2011

DISTRICT ISSUE	OPPORTUNITIES FOR IMPROVEMENT
Removal from the home school classroom for minor but repetitive misconduct	Better guidance on assessing penalties
	Chronic misbehavior as a trigger for intervention review
Identification and transmittal of educational deficiencies for students moving between alternative education programs	Better engagement of Student Assistance Teams
	Better communication between home school and alternative programs
	Consistency in service levels for transferring students
Consistent application of behavioral interventions	Increased accountability at supervisory levels for continued application
	Improved return on district investment in programs
Appropriate staffing for routine enforcement activities	Clear expectations for school staff for law enforcement intervention
	Behavior training for security staff
	Right staffing of security for safety level

SOURCE: WISD staff interviews, November, 2011.

This recommendation will provide a savings of $362,572 over five years if four security guard positions are phased out. This savings assumes the district will not make a reduction until 2013–14, after a full year of new discipline management techniques have been in place. The average salary for security guards is $21,228; including a benefits rate of 22 percent ($4,670), total salary and benefits is $25,898. If two positions are eliminated in the second year ($51,796) of implementation, and two more in the third year ($103,592), a total of $362,572 can be saved over five years.

ACCOUNTABILITY FOR ATTENDANCE PROCESSES (REC. 59)

WISD lacks programmatic performance goals, performance evaluation against goals, and clear lines of authority for the district's truancy reduction and dropout recovery program. The district recently created a central administrator position for truancy and dropout prevention programs. The position interfaces with the schools, where attendance-related tasks are primarily performed. Attendance staff answers programmatically to the Supervisor of Attendance, Truancy, Dropout Prevention and Recovery (ATDPR), but operationally reporting is split between schools and the central administrative office. Intermixing school service and central oversight provides a balance between individual school priorities and districtwide initiatives, but the lack of clear roles in overlapping areas of responsibility has resulted in a program without defined expectations or accountability for performance. Consequently, the district is missing opportunities for efficiency and for implementing solutions that address specific problem areas.

Exhibit 12–5 shows the average attendance rate of the district, its region, and the state.

EXHIBIT 12–5
WISD AVERAGE ATTENDANCE RATE
2007–08 TO 2009–10

	2007–08	2008–09	2009–10
WISD	94.7	94.3	94.4
Region 12	95.4	95.6	95.4
State	95.5	95.6	95.5

SOURCE: Texas Education Agency, AEIS, 207–08 to 2009–10.

As seen in **Exhibit 12–5**, WISD's overall attendance rate is consistently within a point of the average attendance for area schools and for the state. However, average daily attendance is the basis for school funding calculations and percentage points translate into dollars for school services. The attendance rate is also a reflection of student connections to education as missed school is missed learning. WISD has focused resources on attendance and dropout prevention by creating a central administrative unit responsible for truancy reduction and dropout prevention.

Responsibility for attendance is split between central program oversight and the daily operations of school administration. The attendance process starts with student registration. An employee assigned to maintain student data enters information about new and returning students into district computers. The accuracy of the student data is important as it must be reported to PEIMS and it forms the basis for school funding. The PEIMS/Attendance Clerk also maintains student files (cumulative folders), which holds the hardcopy support for the information entered into the computer. School administrators can temporarily pull clerks from attendance data entry to help school office staff with other tasks, which takes time and focus from data entry duties.

Student attendance is reported by teaching staff throughout the day, and a Parent Campus Liaison (PCL) is assigned to review reported absences for accuracy, track the number of absences per student, notify parents of the absence, and document valid excuses. The accuracy of this process is important as the reported data affects school funding and determines whether criminal truancy charges can be filed. The PCL position makes home visits, attends court when truancy cases are set for court action, and transports students and parents for conferences. According to district job descriptions, this position is also tasked with monitoring student academic progress and notifying teachers, counselors, or other educator staff when a student is in need of assistance, although this position does not require training or expertise in education. Additionally, school administrators have on occasion directed PCLs to transport sick students and disciplined students from school to home, which takes time and focus away from attendance duties.

Once a student has reached three unexcused absences the PCL drafts the court complaint and gives it to the Attendance Court Liaison for filing. The PCL makes the decision to file misdemeanor charges based on the information gathered about the absences and the attendance philosophy of the school principal.

WISD's primary truancy reduction strategy is enforcement based, which by its nature includes the local criminal justice system. Truancy is a fine-only misdemeanor that can be filed

when a student has unexcused absences for three or more days or parts of days. Charges for chronic absenteeism can be filed against both parents and students in municipal court, justice of the peace courts, or in some circumstances in district family courts. Punishment is frequently deferred while the student or parent receives intervention services or performs court assigned tasks designed to rehabilitate and return the student to school.

Exhibit 12–6 compares the number of truancy cases filed to the number of absences meeting the criteria for court filing. As shown in **Exhibit 12–6**, the percentage of cases filed varies substantially by school. The high school alternative education programs have two of the higher court referral rates at 21 percent for the Waco Alternative Campus and 92 percent for the McLennan County Challenge Academy (Challenge Academy). These two programs also have low attendance rates at 75.34 percent and 79.86 percent. Dean Highland Elementary School has a high referral of 83 percent, but an equally high attendance rate at 97.19 percent. Hillcrest Professional Development School has a 97.45 percent attendance rate but has filed no truancy cases. Because there are no programmatic evaluation protocols, it is difficult to conclude if the staffing ratios, threat of court action, or other individual school effort makes a difference in attendance.

Exhibit 12–7 is an organization chart demonstrating the reporting and responsibility hierarchy for attendance and student records. The organization chart shows reporting relationships, not staff location. PCLs and the attendance clerks are physically located at the schools where they are assigned and not centrally located with the Supervisor of ATDPR. The reporting responsibility suggested by the organization hierarchy conflicts with position assignments. According to WISD job descriptions, elementary PCLs report to the principal. Secondary PCLs report to the director of Student Management, with the exception of A. J. Moore High School. The Attendance Clerk job description states the position reports to the principal at the assigned school.

According to district job descriptions the Supervisor of ATDPR has responsibility for evaluating the PCLs. To evaluate workload and effort, the supervisor requires each PCL to keep a daily log of contacts and home visits. The log also indicates the amount of time spent on non-attendance related assignments since the supervisor does not control daily assignments.

Attendance staff deployment is also not centralized. For example, Viking Elementary School has two PCLs to service 259 students. Waco High School has two PCLs to service 1,547 students. The Supervisor of ATDPR has responsibility for the program area but cannot move positions to gain efficiencies or place resources where they are most needed.

The organizational structure has created additional accountability challenges. For example, school staff received training on dropout prevention measures. The training instructed the schools to establish a "leaver" team to monitor and promptly address students that leave the school. Leaver is a term to describe students that stop attending, or leave, a district school. Leavers are identified for follow-up to determine if a student has enrolled in another school, is being home schooled, or has dropped out. Per the training, the Supervisor of ATDPR should have received organization charts showing the leaver roles and responsibilities from the schools, but did not. Leaver team meetings are not regularly held at all schools. It is unclear the authority that the Supervisor of ATDPR has to require a principal to put a school protocol or best practice in place for leaver teams or other attendance processes.

As another accountability example, truancy and dropout reduction is a districtwide goal, but strategies for attendance improvement are adopted at the school level. Each Texas school is required to develop a campus improvement plan (CIP) that includes identification of the staff responsible for performance of the strategy. The Supervisor of ATDPR has not been engaged in developing school level strategies, and it is unclear whether he can adopt a measurable program goal such as reduction in the number of absences by some percentage and expect school assistance in carrying out the strategies. The Supervisor of ATDPR has requested copies of the CIPs, but some schools have not responded. Without the plans the supervisor does not know if his area of responsibility has been included in a strategy, or if he is accountable for the success of the strategy.

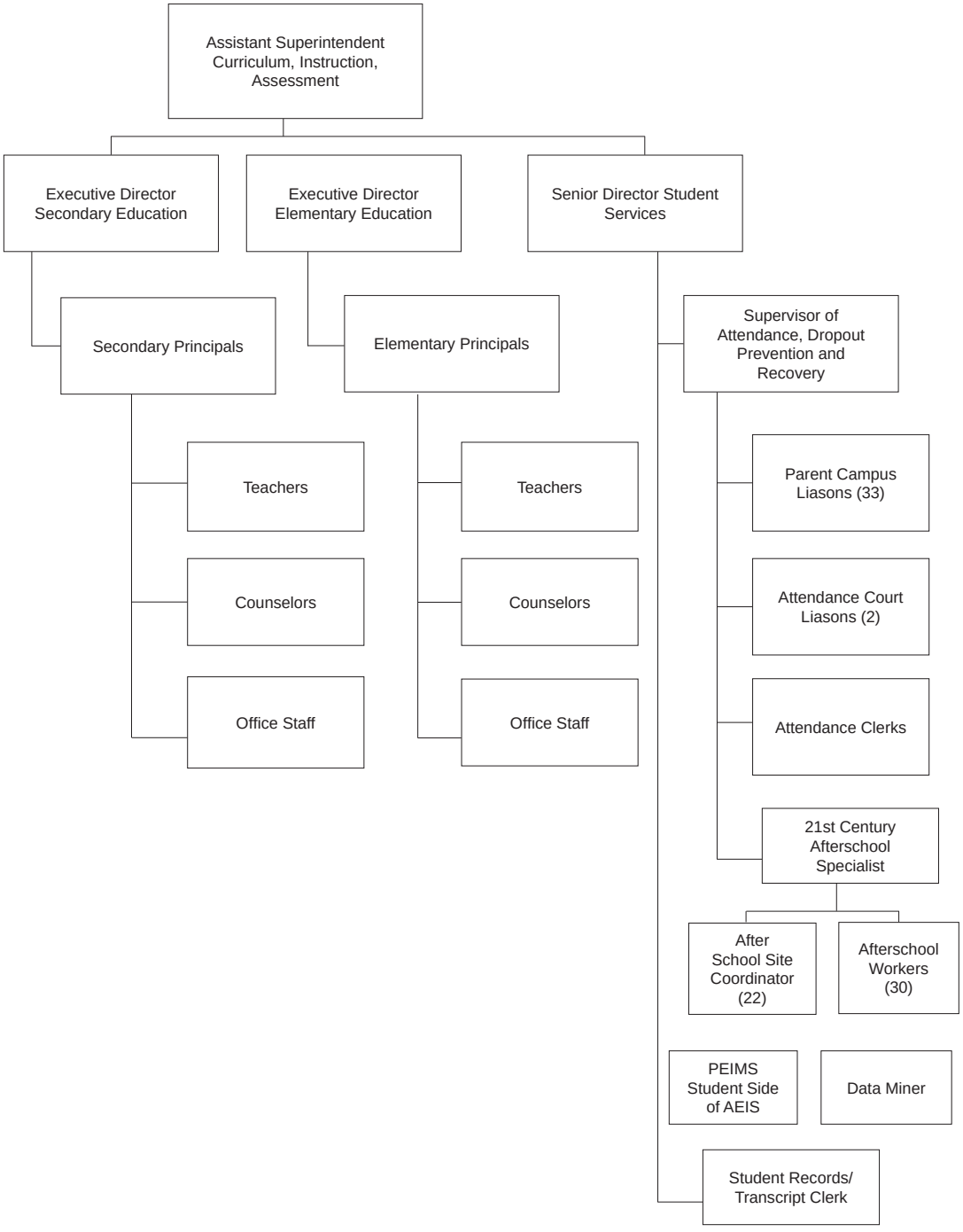
Finally, responsibility for data accuracy in the student information reporting process is unclear. The principal is responsible for the educational outcomes of the school, which includes attendance. Attendance staff is located in the schools where control of the work environment rests with the principal. To the extent that data quality is affected by a distracting work area or insufficient workspace to organize and maintain files, the principal controls those factors. Timely and accurate reporting of student absences starts

EXHIBIT 12–6
WISD TRUANCY CASE REFERRALS BY SCHOOL
2010–11

SCHOOL	PCL PER SCHOOL	STUDENT POPULATION PER LIAISON	YEAR-TO-DATE % ADA	INCIDENTS OF THREE OR MORE UNEXCUSED ABSENCES	COURT REFERRALS PER SCHOOL	PERCENT OF QUALIFYING ABSENCES REFERRED
A.J. Moore High School	1	644.0	94.98%	502	27	5%
University High School	2	662.5	90.28%	1328	108	8%
Waco High School	2	773.5	91.07%	1,512	231	15%
S.T.A.R.S.	1	95.0	77.00%	502	12	2%
Waco Alternative Campus*	.5	62.0	75.34%	203	43	21%
Challenge Academy	NA	NA	79.86%	12	11	92%
Brazos Middle School	1	382.0	95.00%	414	15	4%
Cesar Chavez Middle School	1	463.0	94.20%	439	97	22%
G.W. Carver Academy	1	491.0	96.67%	176	**	1%
Lake Air Intermediate	1	745.0	95.73%	727	**	1%
Tennyson Middle School	1	589.0	95.36%	595	20	3%
University Middle School	1	572.0	95.24%	525	38	7%
Waco Alternative Campus*	.5	57.0	80.44%	139	**	1%
Challenge Academy	NA	NA	80.02%	148	0	0%
Alta Vista Montessori	1	460.0	96.23%	174	5	3%
Bell's Hill Elementary	NA	NA	96.81%	148	6	4%
Brook Ave. Elementary	1	350.0	96.26%	139	0	0%
Cedar Ridge Elementary	1	557.0	96.12%	239	0	0%
Crestview Elementary	1	525.0	95.78%	213	17	8%
Dean Highland Elementary	1	289.0	97.19%	6	5	83%
Hillcrest PDS	1	286.0	97.45%	54	0	0%
J.H. Hines Elementary	1	634.0	94.51%	463	24	5%
Kendrick Elementary	NA	NA	97.80%	10	0	0%
Lake Waco Montessori	1	392.0	96.12%	91	0	0%
Meadowbrook Elementary	1	284.0	96.23%	121	**	2%
Mountainview Elementary	1	463.0	96.95%	194	0	0%
North Waco PDS	1	531.0	97.15%	178	6	3%
Parkdale Elementary	1	422.0	96.40%	58	0	0%
Provident Heights Elementary	1	415.0	96.61%	95	0	0%
South Waco Elementary	1	613.0	95.11%	293	17	6%
Sul Ross Elementary	1	396.0	96.47%	218	11	5%
Viking Hills Elementary	2	129.5	96.37%	28	**	14%
West Avenue Elementary	1	364.0	96.60%	145	6	4%

*The Waco Alternative Campus has a single position which services both middle and high school students assigned to the school. The position is shown as 0.5 for each category for purposes of analysis.
**Numbers less than five have not been cited due to the Family Educational Rights and Privacy Act (FERPA) 34CFR Par 99.1 and Texas Education Agency procedure OP10-03.
SOURCE: WISD Attendance Report, 2010–11.

EXHIBIT 12–7
WISD ORGANIZATION OF ATTENDANCE DUTIES
2010–11



NOTE: This organization shows reporting relationships not staff location.
SOURCE: WISD Organization Chart, October 3, 2011.

primarily with the teacher and office staff, and the principal controls those factors.

The Supervisor of ATDPR regularly audits attendance paperwork generated by the attendance staff, but has noted a backlog of unfiled registration information and missing cumulative student folders which should contain supporting documentation for student attendance. While the supervisor has instituted new protocols for documenting the work of attendance staff, schools decide whether or not an attendance excuse is documented in writing by the parent or is accepted in a phone call.

In interviews, staff said data accuracy is a concern, and WISD has acknowledged data accuracy challenges in reports and improvement plans. Data accuracy is critical to determining the extent of a problem and the success in addressing it. Without clear lines of accountability, WISD's student information process has resulted in incomplete files and inefficiencies in confirming the accuracy of reported information.

Many school districts have established attendance protocols which provide consistent expectations across the district. Best practices in education include a commitment by administrators, teachers, and other stakeholders to clearly explain common goals. Monitoring, accountability, and assessment of progress toward goals are also standards found in effective organizations.

WISD should clarify roles and responsibilities in the attendance program and develop procedures for assuring accountability for performance from all participants. A committee of representative positions having accountability for attendance should meet to identify and resolve problems with overlapping responsibilities. The attendance accountability committee should also agree upon quality control procedures that identify errors, document the correction, and hold persons responsible when a pattern of inaccurate or untimely reporting emerges. The committee should be chaired by the Supervisor of ATDPR.

The assistant superintendent for Curriculum, Instruction and Assessment should review the attendance accountability committee procedures, clarifying any uncertainty about final responsibility for operations, goal setting, strategy development, staff deployment, and program performance.

The committee is not a substitute for the authority of administrators in this area, but is a process for ensuring communication between those responsible for student attendance. Once initial lines of responsibility are addressed, the committee should still meet periodically to communicate non-routine issues needing resolution. The committee should also be a place for developing solutions requiring policy change. As an example, attendance is substantially lower in the discipline related alternative education programs. As part of the consequences of misbehavior, students assigned to disciplinary programs must find their own transportation. In addressing causes of lower attendance rates in disciplinary programs, the transportation policy may be a factor. The committee should review policies that contribute to poor attendance and make recommendations for improvement. According to district administration, since the time of the onsite visit, the district began providing transportation to students in the disciplinary programs in February 2012.

Job descriptions should be updated to reflect current reporting relationships and duties, so staff understands which administrator position is responsible for supervision and direction and the expectations for each position. Staff with attendance responsibilities should also be given measurable goals in areas where failure to meet expectations has a direct impact on the performance of a process. Teachers reporting attendance should be given goals for timely taking and reporting attendance. Office staff should have goals for accurately documenting and relaying excuses and other information received. Parent Campus Liaisons should have goals for accuracy of paperwork, timeliness of parent or student contacts, and other measures as determined by the Supervisor of ATDPR.

This recommendation can be accomplished with existing resources.

ADDRESSING SAFETY PRIORITIES (REC. 60)

WISD lacks a clearly defined process for identifying and resolving safety and security issues across district departments leaving accountability gaps in identifying, prioritizing, budgeting, and addressing safety issues. Safety functions cross several departments, but no particular position has assigned responsibility for safety oversight. Providing a safe environment to students and staff requires addressing an assortment of concerns, from mitigating physical hazards such as slippery steps, to securing buildings from unauthorized access.

Texas school districts have statutory responsibilities related to safety. For example, districts must perform a safety audit every three years, with the most recent statutory audit due in August of 2011. In performing the audit, a district confirms

areas of safety and security weakness. In the years between audits, school districts are required to monitor progress toward correcting acknowledged problems and identify any new issues that develop.

WISD hired a consultant from the Education Service Center XII (Region 12) to perform the audit. When complete, the security audit must be provided to the Texas School Safety Center (TSSC), which developed the audit protocol according to legislative directives. WISD did not have an electronic copy of the Region 12 report with supporting detail that could be easily provided to the review team, indicating it is not a centralized working document easily accessed and updated by a variety of departments. In a November 2011 interview, the Chief of Police said he expected to get a copy of the audit for implementation after the risk manager finishes with the document. According to district staff, the WISD Police Department received the audit after the onsite visit and assignments have been made to address the safety concerns. The district develops budget goals related to safety. In both 2010–11 and in 2011–12 the goals supporting safe and secure schools included:

- Develop plans for remediation of risks identified in safety audits.
- Expand and enhance security camera systems throughout the secondary campuses.
- Provide the Thor Guard™ weather prediction system for all district campuses.

The district has installed the weather prediction system that alerts when severe weather is in the vicinity. Security camera systems are in use in the secondary schools. However, there is no safety and security master plan that prioritizes or coordinates project level remediation plans on items in the safety audit.

The district does not have a single point of oversight tasked with making sure identified safety issues have been corrected. Departments have individual processes for identifying and addressing safety issues. The Facilities and Maintenance Department identifies issues through reports of problems from principals or when identified in the triennial safety audit. The department may also receive information about needed safety repairs from the district's risk manager. Although buildings do not receive regular safety review, the Facilities and Maintenance Department does perform playground condition reviews each winter and schools complete a project "wish list" that describes desired projects, the justification for the project, the desired date of completion, and estimated costs to fund. WISD provided a completed form as a sample, but the form only estimated costs for one of the six projects and there was no place to provide or connect information on project acceptance or plans for implementation to the request.

Different administrators have safety related responsibilities. Law enforcement is under the Chief of Police; risk management is under the executive director of Human Resources. The director of Facilities and Maintenance is responsible for the district's physical plant. Principals are responsible for the safety and security of students and staff, which touches all areas. Without effective coordination, safety-related requirements may be deferred or missed. For example, the Americans with Disabilities Act (ADA) requires modification of public facilities to provide safe access to persons with challenged abilities. Historical and aging district facilities will require $9.4 million in ADA compliance projects. One school is addressing an ADA playground issue by attempting to win funds in a corporate award program. Although innovative solutions have been explored, they are not a substitute for a coordinated, prioritized plan.

From time to time the district forms single purpose committees to address a particular safety issue. WISD has a safety audit committee, but since the statutory audit is contracted to an outside consultant, the committee does not meet. Although the safety audit team is not active, WISD has a core safety team that is responsible for developing the district's emergency operations plan. The core team includes management level members such as the Chief of Police, the director of Communications, the senior director of Student Services, and the executive director of Human Resources. The core team develops emergency drill schedules and works with other emergency operations responders in the community, but they are not responsible for general oversight of safety and security issues across the district.

Safety programs compete with other district needs for resources. WISD has decentralized its budget to place greater accountability on schools and departments for the success of the district's mission. While accountability at all levels is critical for the success of the district's mission, distributed responsibility for the success of districtwide safety strategies has resulted in different levels of performance on meeting those goals.

An example of decentralized responsibility for safety issues is the prevention of unauthorized access to schools. The district has implemented security measures at its schools for

identifying and screening visitors. Accountability for this process is assigned to individual schools. Some schools have technology which screens prospective visitors for criminal history. In other schools, visitors sign-in and receive a handwritten temporary identification badge.

Visitor identification measures are not consistently implemented from school to school. At a random sample of schools, a school review team member was able to walk about with few challenges. Office personnel did not request identification before providing a visitor pass. Passing staff did not direct the team member to the office to sign in and get an identification badge. In contrast, teaching staff at the Challenge Academy notified the school resource officer while the school reviewer was still in the parking lot photographing the security measures at the entrance of the school. Although no one has been assigned responsibility for ensuring schools are consistently enforcing visitor policies, the Chief of Police said he intended to test the practices in the future.

Another security measure for controlling access is limiting keys and electronic access codes to persons with a need to access a secured area. District schools and the Facilities and Maintenance Department share accountability for implementing these security measures. The district has taken steps to secure its buildings by installing patented locking systems with keys that cannot be duplicated at a local locksmith or hardware store. At the request of the Facilities and Maintenance Department, a new key management policy has been adopted requiring schools to designate a position responsible for tracking key assignments. Staff checks out keys at the beginning of the school year, which should be returned at the end of the school year.

Principals and central administrators determine who receives keys in the areas under their control, so assignment policies vary across the district. Some principals only provide teachers with a key to the classroom, some principals provide teachers with keys to both the classroom and the building. There is no inventory of keys made by the Facilities and Maintenance Department, or control over the number of keys requested by an administrator. A review of "back to school" key requests in August and September 2011 revealed 175 work orders for new or duplicate keys at a cost to the district of $5,579. This figure is not limited to building door keys, but includes file cabinets, storage areas, and other secured areas. According to the director Facilities and Maintenance, should a master key to an exterior building door be lost, the cost of re-keying the door is around $500.

Schools also have electronic access to exterior doors that connect to the district alarm system. Staff without a building key can enter a school building with a personal identification code. Personal identification codes are issued by the Facilities and Maintenance Department, and schools are expected to notify the department when an employee terminates or when a code is lost or compromised. Staff said that custodial turnover is high, and it is not uncommon for an employee to be gone for a week or two before notification to disable access codes is given. Some district employees also share building access codes, increasing the risk of unauthorized access.

While staff said safety communication between departments is good, the lack of centralized oversight and planning has resulted in missed opportunities to maximize performance of safety strategies across the district. For example, expense and risk related to losing building keys can be minimized by reducing the number of persons with keys and a districtwide policy that limits exterior door keys, particularly where an electronic access pad is available, could reduce the number of keys in circulation. The Texas School Safety Center provides numerous guidelines, best practices, and templates for developing and implementing safety planning practices at www.txssc.txstate.edu.

WISD should expand the duties of the core safety team from crisis management to districtwide oversight of safety programs that includes coordination of planning, prioritizing, and scheduling implementation of recommendations. The use of the team provides a forum for overlapping responsibilities, safety challenges, and for budget priorities to be discussed and resolved. The team should create a format for coordinating identified problems, estimated costs and, assigning life safety or statutory compliance priorities. The coordinating plan should be regularly reviewed for performance and updated at least annually, and should be developed on a three-year cycle consistent with the safety audit.

A well-developed safety plan should coordinate with other district plans, such as facility plans and school improvement plans. For example, a plan that includes adding visitor scanning technology to schools could project needed funding over a three year implementation cycle, reducing the impact of the project in any one fiscal year. The plan could also include development and dissemination of policies related to the type of criminal history that will not impact a visitor,

such as misdemeanor convictions over 10-years old or fine only convictions, assuring parents or the community of both safety and accessibility. This recommendation can be accomplished 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	2012–13	2013–14	2014–15	2015–16	2016–17	TOTAL 5-YEAR (COSTS) OR SAVINGS	ONE TIME (COSTS) OR SAVINGS
57. Engage area leadership in developing solutions to juvenile misbehavior by leveraging both school and community resources in a collaborative, targeted plan.	$0	$0	$0	$0	$0	$0	$0
58. Develop a multi-faceted approach to student misconduct.	$0	$51,796	$103,592	$103,592	$103,592	$362,572	$0
59. Clarify roles and responsibilities in the attendance program and develop procedures for assuring accountability for performance from all participants.	$0	$0	$0	$0	$0	$0	$0
60. Expand the duties of the core safety team from crisis management to districtwide oversight of safety programs that includes coordination of planning, prioritizing, and scheduling implementation of recommendations.	$0	$0	$0	$0	$0	$0	$0
TOTALS–CHAPTER 12	**$0**	**$51,796**	**$103,592**	**$103,592**	**$103,592**	**$362,572**	**$0**